

# CEA CAPA Privacy Notice

## 1. **What is this document and why should you read it?**

- 1.1 This privacy notice explains how Cultural Experiences Abroad, LLC including its affiliates and subsidiaries worldwide (collectively referred to as "**CEA CAPA**", "**we**", "**our**" and "**us**") uses, stores and protects personal data relating to our employees, staff, contractors, trainees, officers, consultants, and temporary or agency workers across all jurisdictions in which we operate (referred to as "**you**").
- 1.2 You should read this notice, so that you know what we are doing with your personal data. Please also read any other privacy notices that we give you, that might apply to our use of your personal data in specific circumstances in the future.
- 1.3 This notice does not form part of your contract of employment or any other contract to provide services. This notice may be subject to change to align with legislative updates.

## 2. **CEA CAPA's data protection responsibilities**

- 2.1 "**Personal data**" is any information that relates to an identifiable natural person. Your name, address, contact details, demographic information, national identifier numbers, passport and residency permit information, salary details and CV are all examples of your personal data, and any other relevant information if they identify you.
- 2.2 The term "**process**" means any activity relating to personal data, including, by way of example, collection, storage, use, consultation and transmission.
- 2.3 CEA CAPA is a "**controller**" of your personal data. This is a legal term – it means that we make decisions about how and why we process your personal data and, because of this, we are responsible for making sure it is used in accordance with data protection laws.
- 2.4 You also have responsibilities whenever you process personal data in connection with the performance of your role at CEA CAPA; these are outlined in the CEA CAPA Data Protection Policy.

## 3. **What types of personal data do we collect and where do we get it from?**

- 3.1 We collect many different types of personal data about you for lots of reasons. We cannot administer our employment or other relationship with you without your personal data. Where we don't need your personal data, we will make this clear, for instance we will explain if any data fields in our application or staff survey processes are optional and can be left blank.
- 3.2 Further details of the personal data we collect, where we get it from and what we do with it are set out in **Schedule 1**.
- 3.3 You provide us with personal data directly when you apply for a job with us, when you complete and/or update your employee information in our Human Resource Information System (HRIS) and/or payroll systems, when you submit any information in connection with offers of employment, or when you correspond with us and in the course of performing your job. We also create some personal data ourselves and obtain some personal data from other sources. We obtain it from other people and organisations, including some public sources, such as publicly available directories and online resources, your emergency contacts, your use of CEA CAPA provided assets, systems and platforms, your line manager and co-workers, your dependants and beneficiaries, third party benefits providers. You can read more about the sources of personal data in the more detailed information set out in as explained in **Schedule 1**.
- 3.4 If any of the personal information you have given to us changes, such as your contact details, please inform us without delay primarily by updating your details in the HRIS or in the alternative by contacting [peopleops@ceacapa.com](mailto:peopleops@ceacapa.com).

#### 4. **What do we do with your personal data, and why?**

4.1 We process your personal data for particular purposes in connection with your employment or engagement with us, and the management and administration of our business.

4.2 We are required by law to always have a permitted reason or justification (called a "lawful basis") for processing your personal data. The table at **Schedule 2** sets out the different purposes for which we process your personal data and the relevant lawful basis on which we rely for that processing.

4.3 Please note that where we have indicated in the table at **Schedule 2** that our processing of your personal data is either:

4.3.1 necessary for us to comply with a legal obligation; or

4.3.2 necessary for us to take steps, at your request, to potentially enter into an employment contract with you, or to perform it,

and you choose not to provide the relevant personal data to us, we may not be able to enter into or continue our contract of employment or engagement with you.

4.4 We use some of your personal data for automated decision making for applicant processing in the recruitment and hiring process. Examples of details could be national identifiers, address, education details, personal references, aptitude tests, and DOB and legal background information, if applicable. The impact of using automated decision making is to make a hiring decision. We may also convert your personal data into statistical or aggregated form to better protect your privacy, or so that you are not identified or identifiable from it. Anonymised data cannot be linked back to you. We may use it to conduct research and analysis, including to produce statistical research and reports. For example, to help us understand how many of our total workforce number are on secondments at any given time.

#### 5. **Special category personal data (including criminal data)**

5.1 We are required by law to treat certain categories of personal data with even more care than usual. These are called sensitive or special categories of personal data and different lawful bases apply to them. The table at **Schedule 3** sets out the different purposes for which we process your special category personal data and the relevant lawful basis on which we rely for that processing. For some processing activities, we consider that more than one lawful basis may be relevant – depending on the circumstances.

#### 6. **Who do we share your personal data with, and why?**

6.1 Sometimes we need to disclose your personal data to other people.

6.2 *Inside the CEA CAPA group.*

6.2.1 We are part of the **CEA CAPA** group of companies. Therefore, we may need to share your personal data with other companies in the **CEA CAPA** group, including Infinedi Partners, CEA CAPA Holdco, LLC, CEA CAPA Midco, LLC, Cultural Experiences Abroad, LLC, Global Educators LLC, Center for International Studies, LLC, Barcelona SAE, LLC, Centre for International Studies Pty Ltd., St. Mary's Institute for Academic Excellence, LLC, CEA Holdings, LLC, CAPA International Education LLC, CEA Global Campus Spain S.L., Experiencias Culturales Internacionales ECI, S.R.L., CAPA International Education Foundation LP, Education Abroad Holdings Ltd., CAPA the Global Education Network Ltd, Cultural Experiences Abroad Prague s.r.o., Cultural Experiences Abroad France S.A. R.L., Student Support Services Italy S.R.L., and CEA Global Education Argentina S.R.L., for our general business and workforce management purposes, to meet customer needs where working across offices/locations, for line management, authorisations/approvals with relevant decision makers, parental reporting and where systems and services are provided on a shared basis. For example, your business contact details, photograph and biography will be available to colleagues throughout the group.

6.2.2 Access rights between members of the CEA CAPA group are limited and granted only on a need to know basis, depending on job functions and roles.

6.2.3 Where any CEA CAPA group companies process your personal data on our behalf (as our processor), we will make sure that they have appropriate security standards in place to make

sure your personal data is protected and we will enter into a written contract imposing appropriate security standards on them, as appropriate.

### 6.3 *Outside the CEA CAPA group*

6.3.1 From time to time we will ask third parties to carry out certain business functions for us, such as the administration of our HR, payroll and our IT support. These third parties will process your personal data on our behalf (as our processor). We will disclose your personal data to these parties so that they can perform those functions. Before we disclose your personal data to other people, we will make sure that they have appropriate security standards in place to make sure your personal data is protected and we will enter into a written contract imposing appropriate security standards on them, as appropriate. Examples of these third party service providers include service providers and/or sub-contractors, such as our outsourced payroll, HR and marketing service providers, and our IT systems software and maintenance, back up, server hosting and cloud-based providers.

6.4 In certain circumstances, we will also disclose your personal data to third parties who will receive it as controllers of your personal data in their own right for the purposes set out above, in particular:

6.4.1 if we transfer, purchase, reorganise, merge or sell any part of our business or the business of a third party, and we disclose or transfer your personal data to the prospective seller, buyer or other third party involved in a business transfer, reorganisation or merger arrangement (and their advisors); and

6.4.2 if we need to disclose your personal data in order to comply with a legal obligation, to enforce a contract or to protect the rights, property or safety of our employees, customers or others.

6.5 We have set out below a list of the categories of recipients with whom we are likely to share your personal data:

6.5.1 employment-related benefits providers and other third parties in connection with your benefits (such as pension trustees);

6.5.2 clients;

6.5.3 consultants and professional advisors including legal advisors and accountants;

6.5.4 courts, court-appointed persons/entities, receivers and liquidators;

6.5.5 business partners and joint ventures;

6.5.6 trade associations and professional bodies;

6.5.7 insurers; and

6.5.8 governmental departments, statutory and regulatory bodies including the Department for Work & Pensions, Information Commissioner's Office, the police and Her Majesty's Revenue and Customs.

We may also share your personal data with third parties, as directed by you.

## 7. **Where in the world is your personal data transferred to?**

7.1 If any of our processing activities require your personal data to be transferred outside the country you work in, we will only make that transfer if:

7.1.1 the country to which the personal data is to be transferred ensures an adequate level of protection for personal data;

7.1.2 we have put in place appropriate safeguards to protect your personal data, such as an appropriate contract with the recipient (please contact CEA CAPA if you wish to obtain a copy of these);

7.1.3 the transfer is necessary for one of the reasons specified in data protection legislation, such as the performance of a contract between us and you; or

7.1.4 you explicitly consent to the transfer.

## 8. **How do we keep your personal data secure?**

8.1 We will take specific steps (as required by applicable data protection laws) to protect your personal data from unlawful or unauthorised processing and accidental loss, destruction or damage. For more information, please read our Information Security Policy.

## 9. **How long do we keep your personal data for?**

9.1 If you are our employee we will keep your personal data during the period of your employment and then, after your employment with us ends, for as long as is necessary in connection with both our and your legal rights and obligations. This may mean that we keep some types of personal data for longer than others.

9.2 We will only retain your personal data for a limited period of time. This will depend on a number of factors, including:

9.2.1 any laws or regulations that we are required to follow;

9.2.2 whether we are in a legal or other type of dispute with each other or any third party;

9.2.3 the type of information that we hold about you; and

9.2.4 whether we are asked by you or a regulatory authority to keep your personal data for a valid reason.

9.3 Any personal data contained in any work related correspondence or records may be retained for longer, dependant on the retention period of the file that your personal data is held on.

## 10. **What are your rights in relation to your personal data and how can you exercise them?**

10.1 You have certain legal rights, which are briefly summarised at **Schedule 4**, in relation to any personal data about you which we hold.

10.2 Where our processing of your personal data is based on your **consent**, you have the right to withdraw your consent at any time. If you do decide to withdraw your consent we will stop processing your personal data for that purpose, unless there is another lawful basis we can rely on – in which case, we will let you know. Your withdrawal of your consent won't impact any of our processing up to that point.

10.3 Where our processing of your personal data is necessary for our **legitimate interests**, you can object to this processing at any time. If you do this, we will need to show either a compelling reason why our processing should continue, which overrides your interests, rights and freedoms or that the processing is necessary for us to establish, exercise or defend a legal claim.

10.4 If you wish to exercise any of your rights, please contact [legal@ceacapa.com](mailto:legal@ceacapa.com) in the first instance.

10.5 You also have the right to lodge a complaint with the data protection regulator in your respective jurisdiction.

## 11. **Updates to this notice**

11.1 We may update this notice from time to time to reflect changes to the type of personal data that we process and/or the way in which it is processed. We will update you on material changes to this notice by notifying you electronically.. We also encourage you to check this notice on a regular basis.

## 12. **Where can you find out more?**

12.1 If you want more information about any of the subjects covered in this privacy notice or if you would like to discuss any issues or concerns with us, you can contact us by email at [legal@ceacapa.com](mailto:legal@ceacapa.com).

**SCHEDULE 1**  
**Categories of Personal Data**

Type of personal data	Collected from
<b>a) Contact Information</b>	
<ul style="list-style-type: none"> <li>Name(s)</li> <li>Address(es)</li> <li>Email address(es)</li> <li>Contact details including mobile telephone number(s)</li> </ul>	You
<b>b) Personal Information</b>	
<ul style="list-style-type: none"> <li>Date of birth</li> <li>Sex</li> <li>Gender</li> <li>Ethnicity</li> <li>Next of kin or other dependants</li> <li>Marital or relationship status</li> <li>Lifestyle and social circumstances</li> <li>Emergency contact information</li> </ul>	You
<b>c) Identity and Background Information</b>	
<ul style="list-style-type: none"> <li>Details of education and qualifications and results</li> <li>Career history, experience and skills</li> <li>Passport information</li> <li>Social security information</li> <li>Driving licence information</li> <li>Psychometric test results</li> <li>Right to work, residency and/or other visa information (where unrelated to your race or ethnicity)</li> <li>Documents that establish identify</li> <li>Documents that establish employment authorization</li> <li>Curriculum Vitae (CV) or resume and professional profile</li> <li>Image or photographs</li> <li>Application form</li> <li>Evaluative notes and decisions from job interviews</li> <li>Preferences relating to job location and salary</li> <li>Conflicts of interests (including where related to family networks)</li> <li>Police / background check clearance, if applicable</li> </ul>	<ul style="list-style-type: none"> <li>You</li> <li>Recruitment consultants and agencies</li> <li>Your previous employers</li> <li>Publicly available information from online resources</li> <li>National Criminal Database or Multijurisdictional Database</li> </ul>
<b>d) Financial Information</b>	
<ul style="list-style-type: none"> <li>Bank account details</li> <li>Salary, compensation and other remuneration information</li> <li>National insurance number and/or other governmental identification numbers</li> <li>Business expense and reimbursement details</li> <li>Company stock options and purchase plans</li> <li>Credit checks</li> </ul>	<ul style="list-style-type: none"> <li>You</li> <li>Your previous employer</li> <li>Credit Bureau</li> </ul>
<b>e) Special Category Personal Data</b>	
<ul style="list-style-type: none"> <li>Racial or ethnic origin (including your nationality and visa information)</li> <li>Political opinions</li> <li>Religious or philosophical beliefs</li> <li>Trade union membership</li> <li>Biometric data (including fingerprint and retinal scans)</li> </ul>	<ul style="list-style-type: none"> <li>You</li> <li>Your emergency contact(s)</li> <li>Your use of CEA CAPA security control systems</li> </ul>

Type of personal data	Collected from
<ul style="list-style-type: none"> <li>Data concerning physical and/or mental health (including occupational health requirements, accident reports, day-to-day health concerns such as diabetes or epilepsy conditions which we should be aware of, dietary requirements, allergies, drug and alcohol test results and reasons for any short term or long term absence)</li> <li>Sexual orientation</li> <li>Health and safety and accident records and reports</li> <li>Information relating to actual or suspected criminal convictions and offences</li> </ul>	
<b>f) Employment Administration Information</b>	
<ul style="list-style-type: none"> <li>Terms and conditions of employment</li> <li>Work related contact details (including location and office and corporate phone numbers)</li> <li>Image/photographs</li> <li>Holiday and other leave related records</li> <li>Your working preferences and feedback in relation to CEA CAPA and our staff</li> <li>Your preferences in relation to our use of your personal data</li> <li>Hours worked and working time preferences</li> <li>Statutory and non-statutory leave and absence records</li> <li>Job termination details</li> </ul>	<ul style="list-style-type: none"> <li>You</li> </ul>
<b>g) Job Performance Information</b>	
<ul style="list-style-type: none"> <li>Role responsibilities</li> <li>Personal development reviews and appraisals, and associated feedback</li> <li>Training records</li> <li>Attendance information, including clocking in/out systems or timesheets</li> <li>Promotion application and/or outcome records</li> <li>Transfer and secondment information</li> </ul>	<ul style="list-style-type: none"> <li>You</li> <li>Your line manager(s) and co-workers</li> <li>Training providers</li> <li>Company/organisation to which transferred or seconded</li> </ul>
<b>h) Investigation, Grievance and Disciplinary</b>	
<ul style="list-style-type: none"> <li>CEA CAPA investigations records</li> <li>Grievance and disciplinary records</li> <li>Employment tribunal records</li> </ul>	<ul style="list-style-type: none"> <li>You</li> <li>Your line manager(s) and co-workers</li> <li>Third parties, as permitted by applicable law</li> </ul>
<b>i) Travel and Expenses Information</b>	
<ul style="list-style-type: none"> <li>Transaction records</li> <li>Visa, passport and insurance details</li> <li>Flight and accommodation booking information</li> <li>Travel itinerary information</li> </ul>	<ul style="list-style-type: none"> <li>You</li> <li>Your use of CEA CAPA payment cards</li> </ul>
<b>j) Benefits Information</b>	
<ul style="list-style-type: none"> <li>Private healthcare, life assurance and pensions memberships for you and/or your dependants or other beneficiaries</li> <li>Death benefit information</li> <li>Season ticket loan records</li> </ul>	<ul style="list-style-type: none"> <li>You</li> <li>Third party benefits providers</li> <li>Your dependants or other beneficiaries</li> </ul>
<b>k) Asset, Systems and Platform Usage and Communications Information</b>	
<ul style="list-style-type: none"> <li>Computer and phone records</li> <li>Access logs and usage records from document management systems and other CEA CAPA provided applications and technologies</li> <li>User IDs and password information</li> <li>IP addresses and other online and physical device identifiers</li> <li>Records of calls, messages and/or internet or other data traffic and communications</li> </ul>	<ul style="list-style-type: none"> <li>You</li> <li>Us</li> <li>Our suppliers</li> <li>Your use of CEA CAPA assets, systems and platforms</li> </ul>
<b>l) Security, Location and Access Information</b>	
<ul style="list-style-type: none"> <li>Information (including image and biometric data) captured or recorded by electronic card access systems, CCTV and other security control systems</li> </ul>	<ul style="list-style-type: none"> <li>You</li> <li>Your use of CEA CAPA security control systems</li> </ul>

## SCHEDULE 2 Purposes of Processing Personal Data

For some processing activities, we consider that more than one lawful basis may be relevant – depending on the circumstances.

Purposes of processing		Lawful basis We are permitted to process your personal data because...					
		1. You have given your consent to the processing (Please also see paragraph 10.2)	2. It is necessary to perform your employment contract	3. It is necessary for us to comply with a legal obligation	4. It is necessary for our legitimate interests or those of third parties	5. It is necessary to protect your vital interests (or those of someone else)	6. It is necessary to perform a task in the public interest or in our official authority
<b>a) Recruitment and workforce planning</b>							
1.	Administering your application for a job with us and considering your suitability for the relevant role				✓		
2.	Obtaining, considering and verifying your employment references and employment history				✓		
3.	Reviewing and confirming your right to work			✓			
4.	Conducting verification and vetting, including criminal background checks and credit checks where required by law ( <b>Note:</b> special category personal data <b>paragraph 2</b> )			✓			
5.	Conducting background checks, verification and vetting which are not required by law but needed by us to assess your suitability for your role ( <b>Note:</b> special category personal data <b>paragraph 2</b> )	✓					✓
6.	Making a job offer to you and entering into a contract of employment with you		✓				
7.	Identifying and assessing CEA CAPA's strategic business direction and resourcing needs, current employees and areas for development				✓		
8.	Talent management, performance management, promotion and succession planning		✓		✓		
9.	Analysing recruitment and retention objectives, processes and employee turnover rates				✓		
10.	Developing, operating and collecting feedback on recruitment activities and employee selection processes				✓		
<b>General employment management and administration</b>							
11.	Communicating with you and providing you with information in connection with your		✓		✓	✓	

Last updated: September 25, 2025

Version: 1.0

Document owner: Legal

Purposes of processing			Lawful basis We are permitted to process your personal data because...					
			1. You have given your consent to the processing (Please also see paragraph 10.2)	2. It is necessary to perform your employment contract	3. It is necessary for us to comply with a legal obligation	4. It is necessary for our legitimate interests or those of third parties	5. It is necessary to protect your vital interests (or those of someone else)	6. It is necessary to perform a task in the public interest or in our official authority
	employment or engagement with us from time to time							
12.	Paying your salary, compensation and any other benefits pursuant to your contract of employment			✓				
13.	Calculating and administering taxation within payroll, and your entitlements to any statutory/contractual benefits (including statutory sick pay and workforce pension arrangements)				✓			
14.	Facilitating the administration of any private healthcare, life assurance/insurance, pensions initiatives and plans that we offer in connection with your employment with us ( <b>Note:</b> special category personal data <b>paragraph 2</b> )				✓	✓		
15.	General staff administration, including workforce management and facilities operations					✓		
16.	Managing our health and safety and occupational compliance obligations			✓	✓	✓		
17.	Paying you discretionary or non-contractual benefits or other sums					✓		
18.	Managing annual leave entitlement and records, and to administer related payments					✓		
19.	Managing absence records, contractual sick leave entitlement and administering related payments ( <b>Note:</b> special category personal data <b>paragraph 2</b> )			✓		✓		
20.	Managing maternity, paternity, adoption, parental and dependants leave and (where applicable) pay				✓			
21.	Contacting the appropriate person in the event of an emergency concerning you ( <b>Note:</b> special category personal data <b>paragraph 2</b> )						✓	
22.	Administering our insurance policies ( <b>Note:</b> special category personal data <b>paragraph 2</b> )					✓		
23.	Determining whether any adjustments are necessary to enable you to carry out your role			✓	✓			



Purposes of processing		Lawful basis We are permitted to process your personal data because...					
		1. You have given your consent to the processing (Please also see paragraph 10.2)	2. It is necessary to perform your employment contract	3. It is necessary for us to comply with a legal obligation	4. It is necessary for our legitimate interests or those of third parties	5. It is necessary to protect your vital interests (or those of someone else)	6. It is necessary to perform a task in the public interest or in our official authority
	(Note: special category personal data paragraph 2)						
24.	Preparing risk assessments to prevent future injuries in the workplace			✓			
25.	Carrying out performance reviews		✓		✓		
26.	Allocating and assigning responsibilities as necessary for workload management purposes, and measuring staff utilisation				✓		
27.	Administering, recording and analysing training and training records		✓		✓		
28.	Supporting the establishment and maintenance of staff directories				✓		
29.	Considering your continuous suitability for your role		✓		✓		
30.	Providing details of your employment to a new or potential employer, bank or financial institution where requested by you	✓					
31.	Handling grievance and disciplinary matters, including investigating issues, considering appropriate resolution and mitigating actions and reviewing outcomes		✓		✓		
32.	Responding to reference requests from your future potential employers				✓		
b) Security and governance							
33.	Monitoring the security of CEA CAPA's physical premises and systems, networks and applications			✓	✓		
34.	Identifying and authenticating employees and other individuals (Note: special category personal data paragraph 2)			✓	✓	✓	
35.	Establishing a network of emergency contacts for individuals in case of emergency	✓			✓	✓	
36.	Identifying, investigating and mitigating suspected misuse of CEA CAPA's assets, systems and platforms (Note: special category personal data paragraph 2)			✓	✓	✓	✓
37.	Ensuring compliance with CEA CAPA policies and procedures (Note: special category personal data paragraph 2)				✓	✓	

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		1. You have given your consent to the processing (Please also see paragraph 10.2)	2. It is necessary to perform your employment contract	3. It is necessary for us to comply with a legal obligation	4. It is necessary for our legitimate interests or those of third parties	5. It is necessary to protect your vital interests (or those of someone else)	6. It is necessary to perform a task in the public interest or in our official authority
c) Legal and regulatory compliance and responsibilities							
38.	Managing and administering our equal opportunities reporting ( <b>Note:</b> special category personal data <b>paragraph 2</b> )			✓			
39.	Compliance with obligations under the contract of employment between you and CEA CAPA		✓				
40.	Responding to binding requests or search warrants or orders from courts, governmental, regulatory and/or enforcement bodies and authorities ( <b>Note:</b> special category personal data <b>paragraph 2</b> )			✓			✓
41.	Responding to non-binding requests or search warrants or orders from courts, governmental, regulatory and/or enforcement bodies and authorities				✓		
42.	Complying with disclosure orders arising in civil proceedings ( <b>Note:</b> special category personal data <b>paragraph 2</b> )			✓			✓
43.	Investigating, evaluating, demonstrating, monitoring, improving, reporting on and meeting CEA CAPA's compliance with relevant legal and regulatory requirements ( <b>Note:</b> special category personal data <b>paragraph 2</b> )			✓			✓
44.	Investigating, evaluating, demonstrating, monitoring, improving, reporting on and meeting CEA CAPA's compliance with best practice and good governance responsibilities (director changes, ultimate beneficial ownership, powers of attorney, board and shareholder resolutions and minutes).				✓		
45.	Responding to employment and industrial relations matters where permitted by applicable law, including criminal investigations, grievances, arbitrations, negotiations, elections and strikes ( <b>Note:</b> special category personal data <b>paragraph 2</b> )			✓	✓		✓
d) Day-to-day business operations							
46.	Implementing, adapting and enhancing systems and processes to develop or improve our		✓		✓		

Purposes of processing			Lawful basis					
			We are permitted to process your personal data because...					
			1. You have given your consent to the processing (Please also see paragraph 10.2)	2. It is necessary to perform your employment contract	3. It is necessary for us to comply with a legal obligation	4. It is necessary for our legitimate interests or those of third parties	5. It is necessary to protect your vital interests (or those of someone else)	6. It is necessary to perform a task in the public interest or in our official authority
	business and/or make your job easier or more enjoyable							
47.	Managing, planning and delivering our global business, sales and marketing strategies			✓		✓		
48.	Supporting our diversity programmes and staff support networks and initiatives ( <b>Note:</b> special category personal data <b>paragraph 2</b> )		✓					
49.	Publishing external facing materials for marketing and public relations purposes such as where we mention you in the context of CEA CAPA projects and initiatives in our marketing materials, social media posts and press releases			✓		✓		
50.	Administering your travel and accommodation arrangements			✓	✓	✓		
51.	Supporting and maintaining our technology infrastructure			✓	✓	✓	✓	
52.	Supporting the sale, transfer or merging of part or all of our business or assets, or in connection with the acquisition of another business			✓	✓	✓		

**SCHEDULE 3**  
**Purposes of Processing Special Category Personal Data**

Special category lawful basis							
Purposes of processing		We are permitted to process your personal data because...					
		1. You have given <b>your explicit consent</b> to the processing	2. It is necessary for your/our obligations and rights in the field of <b>employment and social security</b> and social protection law	3. It is necessary to protect the <b>vital interests</b> of the data subject or another person you or they are physically or legally incapable of giving consent	4. It is necessary for our establishment, exercise or defence of <b>legal claims</b>	5. It is necessary for reasons of <b>substantial public interest</b>	6. It is necessary for <b>preventive or occupational medicine</b> , for the assessment of the working capacity of the employee
a) <b>Recruitment and workforce planning</b>							
1.	Conducting verification and vetting, including criminal background checks and credit checks where required by law		✓			✓	
2.	Conducting background checks, verification and vetting which are not required by law but needed by us to assess your suitability for your role	✓				✓	
b) <b>General employment management and administration</b>							
3.	Facilitating the administration of any private healthcare, life assurance/insurance, pensions initiatives and plans that we offer in connection with your employment with us		✓			✓	
4.	Managing absence records, contractual sick leave entitlement and administering related payments		✓			✓	
5.	Contacting the appropriate person in the event of an emergency concerning you			✓			
6.	Administering our insurance policies					✓	
7.	Determining whether any adjustments are necessary to enable you to carry out your role		✓				
c) <b>Security and governance</b>							
8.	Identifying and authenticating employees and other individuals	✓				✓	
9.	Identifying, investigating and mitigating suspected misuse of CEA CAPA's assets, systems and platforms			✓	✓		
d) <b>Legal and regulatory compliance and responsibilities</b>							
10.	Managing and administering our equal opportunities reporting					✓	
11.	Responding to binding requests or search warrants or orders from courts, governmental, regulatory and/or enforcement bodies and authorities or sharing information (on a voluntary basis) with the same				✓		

Last updated: September 25, 2025

Version: 1.0

Document owner: Legal

Purposes of processing		Special category lawful basis We are permitted to process your personal data because...					
		1. You have given <b>your explicit consent</b> to the processing	2. It is necessary for your/our obligations and rights in the field of <b>employment and social security</b> and social protection law	3. It is necessary to protect the <b>vital interests</b> of the data subject or another person you or they are physically or legally incapable of giving consent	4. It is necessary for our establishment, exercise or defence of <b>legal claims</b>	5. It is necessary for reasons of <b>substantial public interest</b>	6. It is necessary for <b>preventive or occupational medicine</b> , for the assessment of the working capacity of the employee
12.	Complying with disclosure orders arising in civil proceedings				✓		
13.	Investigating, evaluating, demonstrating, monitoring, improving and reporting on CEA CAPA's compliance with relevant legal and regulatory requirements				✓		
14.	Responding to employment and industrial relations matters where permitted by applicable law, including criminal investigations, grievances, arbitrations, negotiations, elections and strikes				✓		
15.	Making reasonable adjustments as needed to help remove barriers faced by you in your role because of any disability you might have		✓				✓
16.	Delivering occupational health advice and services to you in relation to your role with us		✓				✓
e) <b>Day-to-day business operations</b>							
17.	Supporting our diversity programmes and staff support networks and initiatives	✓					
18.	Providing safeguarding and other special category information in response to reference requests where we feel necessary.					✓	

## SCHEDULE 4

### Your Rights in Relation to Personal Data

Your right	What does it mean?	Limitations and conditions of your right
<b>Right of access</b>	Subject to certain conditions, you are entitled to have access to your personal data (this is more commonly known as submitting a "data subject access request").	If possible, you should specify the type of information you would like to see to ensure that our disclosure is meeting your expectations. We must be able to verify your identity. Your request may not impact the rights and freedoms of other people, e.g. privacy and confidentiality rights of other staff.
<b>Right to data portability</b>	Subject to certain conditions, you are entitled to receive the personal data which you have provided to us and which is processed by us by automated means, in a structured, commonly-used machine readable format.	If you exercise this right, you should specify the type of information you would like to receive (and where we should send it) where possible to ensure that our disclosure is meeting your expectations. This right only applies if the processing is based on your consent or on our contract with you and when the processing is carried out by automated means (i.e. not for paper records). It covers only the personal data that has been provided to us by you.
<b>Rights in relation to inaccurate personal or incomplete data</b>	You may challenge the accuracy or completeness of your personal data and have it corrected or completed, as applicable. You have a responsibility to help us to keep your personal information accurate and up to date. We encourage you to notify us of any changes regarding your personal data as soon as they occur, including changes to your contact details, telephone number, immigration status.	Please always check first whether there are any available self-help tools to correct the personal data we process about you. This right only applies to your own personal data. When exercising this right, please be as specific as possible.
<b>Right to object to or restrict our data processing</b>	Subject to certain conditions, you have the right to object to or ask us to restrict the processing of your personal data.	As stated above, this right applies where our processing of your personal data is necessary for our legitimate interests. You can also object to our processing of your personal data for direct marketing purposes.
<b>Right to erasure</b>	Subject to certain conditions, you are entitled to have your personal data erased (also known as the " <i>right to be forgotten</i> "), e.g. where your personal data is no longer needed for the purposes it was collected for, or where the relevant processing is unlawful.	We may not be in a position to erase your personal data, if for example, we need it to (i) comply with a legal obligation, or (ii) exercise or defend legal claims.
<b>Right to withdrawal of consent</b>	As stated above, where our processing of your personal data is based on your consent you have the right to withdraw your consent at any time.	If you withdraw your consent, this will only take effect for future processing.
<b>Right to complain</b>	If you are unhappy with our processing of your personal data, and you have exhausted efforts within CEA CAPA, you have the right to file a complaint with the appropriate regulator as explained above.	Please contact <a href="mailto:legal@ceacapa.com">legal@ceacapa.com</a> if you would like to raise a formal complaint internally with us.