



Privacy Notice

Reckitt's Virtual Human Rights Audit

08 August 2021



Privacy Notice regarding virtual human rights audit

You have volunteered to participate in the Virtual Human Rights Audit interview. Thank you - as this helps us manage our supply chain and ensure good human rights practices across our supply chain. We are committed to protecting your privacy. This privacy notice explains how we collect, use, disclose and protect your personal information in relation to the Virtual Human Rights Audit interview. Please read this privacy notice so that you are fully aware of how we use your data. If you have any questions regarding this privacy notice, please see the “*How to contact us*” section below. In this Privacy Notice “we”, “us” and “our” refers to all the companies of the Reckitt Benckiser group. Audits are undertaken by or on behalf of Reckitt Benckiser Corporate Services Limited, who can be contacted as below. Other members of the Reckitt Benckiser group or its service providers may undertake the audits. As this Privacy Notice applies globally, there may be differences in how we collect, use or disclose your Personal Information from country to country, in which case we will inform you about any specific differences in your country. This is particularly the case where a non-UK or EU group entity is undertaking the audit.

WHO WE ARE

We are Reckitt Benckiser Corporate Services Limited (having a registered office at 103-105 Bath Road, Slough, Berkshire, SL1 3UH, United Kingdom). We or one of our group companies act as data controller in respect of the processing of your personal information obtained through or in relation to the Virtual Human Rights Audit interview - that is to say we are responsible for deciding how and why your data is used.

DEFINITIONS

By “Personal Information” (in some countries referred to as “personal data” or “personally identifiable information”) we mean any information relating to an identified or identifiable individual. This is broader than just information of a personal or private nature, and also includes information such as your name, date of birth, and e-mail address. Please see “The Personal Information We Collect About You” below for what Personal Information is obtained from you.

By “Sensitive Personal Information” (in some countries referred to as “sensitive personal information” or “special categories of data”) we mean any Personal Information relating to an individual’s racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, genetic data or biometric data processed for the purpose of uniquely identifying that individual, data concerning health, or data concerning an individual’s sex life or sexual orientation. It also includes information about an individual’s criminal offences or convictions, as well as any other information deemed sensitive under applicable data protection laws. In this case, we will be using the types of Sensitive Personal Information set out in “The Personal Information We Collect About You” below.

FAIR AND LAWFUL PROCESSING

We process your Personal Information for the purposes listed below on the basis of our legitimate interest or legal obligation. In some cases, where required by local law, we may ask for your explicit consent for processing your Personal Information for a specific purpose.

We process your Sensitive Personal Information to comply with our obligations to provide for appropriate supply chain employment conditions in accordance with our legal requirement to do so, and where required to assess, defend or determine legal claims.

We only collect, use, disclose or otherwise process your Personal Information and Sensitive Personal Information where it is fair and lawful to do so.

THE PERSONAL INFORMATION WE COLLECT ABOUT YOU

We may collect and use different types of personal information about you, as follows:

- information about your identity (name, date of birth, age, nationality, photograph, gender, signature);
- employment information (company name, contract type - fixed term / temporary / permanent etc., hours of work, job title, personnel number, salary, start date, user ID, absence records, benefits and entitlements data, accommodation provision and passport/identity document security, business unit / division, disciplinary action, health & safety related information and reporting, hours of work, opinions and observations, sick leave period);
- education & skills (languages);
- financial (compensation data);

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- government identifiers (national identification number, national insurance number, social security number);
 - social (associations);
 - professional experience & affiliations (trade union membership) - being Sensitive Personal Information;
 - medical information where relevant to the audit - being Sensitive Personal Information;
 - any aspects of your employment or life where you may be discriminated against, based on international standards - which may be Sensitive Personal Information;
 - other information which you provide to us, which may be Sensitive Personal Information; and
 - contact details (mobile phone and email).

FROM WHERE DO WE GET YOUR PERSONAL INFORMATION

Firstly, we may obtain your Personal Information from you directly during the interview.

Secondly, we may also collect Personal Information about you from your employers (our suppliers) which are the subject of the Virtual Human Rights Audit.

HOW WE USE YOUR PERSONAL INFORMATION

We use your personal information for the purposes of conducting Virtual Human Rights Audit, as follows:

- a) to allow you to participate in the Virtual Human Rights Audit interview,
- b) to review documentation provided by our Suppliers,
- c) to check if our Suppliers follow the provisions of local labour and human rights laws in the field of employment as well as to monitor site compliance with our policies, and
- d) to ensure regulatory compliance.

If you do not provide your personal information to us, we cannot conduct the interview and the Virtual Human Rights Audit might be impossible to complete.

We process your data in case of the above points a) - c) on the grounds that it is necessary for the purpose of our legitimate interests for monitoring compliance with our internal policies, improving supply chain continuity and reducing representational risk to our business, balanced against using data from you to ensure this which we have concluded is an appropriate balance. We process your data in case of the above point c) - d) for the legal obligation, which RB and our Suppliers are subject to. Through the Virtual Human Rights Audit we will be able to monitor local labour, health & safety and environment laws. This will ensure that our Suppliers are compliant with all local laws and that workers receive all legal benefits and rights they are entitled to.

We may create anonymous data records from personal information by excluding any information (such as your name, email address) that make the data personally identifiable to you. We may use this anonymous data for internal reporting and analysis purposes.

We will only use your email address for matters concerned with the Virtual Human Rights Audit.

DISCLOSURE OF YOUR PERSONAL INFORMATION

We disclose your personal information to the following:

Third Party Service Providers. We may share your personal information with third party service providers who work on our behalf. These third party service providers are required not to use your personal information other than to provide the services requested by us.

Affiliates. We may share your personal information with our parent company, subsidiaries, joint ventures, or other companies under a common control ("**Affiliates**"), in which case we will require our Affiliates to comply with this privacy notice.

Acquisitions. If another company acquires our company, business, or our assets, that company will possess the personal information collected by us and will assume the rights and obligations regarding your personal information as described in this privacy notice. In the unlikely event of an insolvency, bankruptcy or receivership, your personal information may also be transferred as a business asset.

Other Disclosures. We may disclose personal information if we believe in good faith that such disclosure is necessary:

- (a) in connection with any legal investigation;
- (b) to comply with relevant laws or to respond to authorities or court orders, subpoenas or warrants served on us;
- (c) to protect or defend our rights or property in relation to the Virtual Human Rights Audit and generally; and/or
- (d) to investigate or assist in preventing any violation or potential violation of the law, this privacy notice, or any applicable agreements.

Transfer to third countries.Your personal information may be transferred to and processed in other countries where laws governing the processing of personal information may be less stringent than the laws in your country. In such cases, where required by local law we will ensure that there are adequate safeguards in place to protect your personal information. This adequate safeguard might be a data transfer agreement with the recipient based on standard contractual clauses approved by the European Commission, but you can request further information on this by contacting us- please see the “*How to contact us*” section below.

FOR HOW LONG WE RETAIN YOUR PERSONAL INFORMATION

We will retain your personal information for as long as we need for the Virtual Human Rights Audit and for a reasonable time thereafter.

- We retain your personal information for 3 months after the publication of the audit report.
- For meeting legal and regulatory requirements (if any), we retain your personal information as required by the applicable law, which may be up to 6 years or longer if legal proceedings are contemplated or underway.

After the expiration of the above retention period, we securely delete your personal information.

YOUR RIGHTS

You may have various rights in relation to your personal information but there are exceptions to each right. In particular, you may have the right to:

- request a copy of personal information we hold about you;
- ask that we update the personal information we hold about you, or correct any personal information that you think is incorrect or incomplete;
- ask that we delete personal information that we hold about you, or restrict the way in which we use your personal information (the “right to be forgotten”);
- object to our processing of your personal information.

Please note that we may be required to retain certain information by law.

If you would like to exercise these rights or understand if they apply to you, please contact us using the details set out at “*how to contact us*” below, and we will respond within a reasonable time.

If you are unhappy with the way we have handled your personal information or any privacy query or request that you have raised with us, you have a right to lodge a claim at competent court or complain to your local data protection regulator.

SECURITY OF YOUR PERSONAL INFORMATION

We are committed to protecting the security of your personal information. We use a variety of security technologies and procedures to help protect your personal information from unauthorized access, use, or disclosure. For example, we limit access to your personal information to employees and contractors who need to know that information for the purposes we described above. Please be aware that, although we endeavour to provide reasonable security for information that we process and maintain, no security system can prevent all potential security breaches. Therefore, while we use reasonable efforts to protect your personal information, we cannot guarantee its absolute security.

HOW TO CONTACT US

If you have any comments, questions or complaints regarding this Privacy Notice or our processing of your personal information, or would like to exercise any of the rights set out at the section “*Your rights*” above, you can contact us and our global data protection officer by sending an e-mail to PrivacyOffice@rb.com. You may also write to us at: RB Global Privacy Office, Turner House, 103-105 Bath Road, Slough, United Kingdom SL1 3UH. Our EU Representative can be contacted at: RECKITT BENCKISER (ENA) B.V. incorporated and registered in the Netherlands with company number 34328831 and whose registered office is at Schiphol Boulevard 267, 1118 BH Schiphol, the Netherlands.

Date: February 2021.