

Processing of personal data survey

Person(s) who provided the information:

Name: Mrs Leila Sangar
Position: Company Secretary
Contacts details: leilasangar@eacotts.com +44 1628 665432
Entity: Constellium UK Ltd

PAYROLL	
A	B
Controller Please identify the controller of the processing	Entity name: Constellium UK Ltd Contact details Leila Sangar, 01628 665432, leilasangar@eacotts.com
Purpose(s) For what purposes has the controller decided to create the processing?	A process for managing the payroll of the employees
Data subjects Who are the individuals whose data are processed? E.g. all employees, trainees, temp, job applicants etc.	Employees of Constellium UK Ltd
Personal data processed What categories of personal data are processed?	Identity: name, NI Number, date of birth, address Personal info: salary & associated payslip items, bank details
Recipient(s) Who can access to the processed personal data? E.g. HR staff, third society which is the processor of the processing etc. <u>NB: in case of a processor, please name the company and provide the contract between the controller and the processor.</u>	HR staff at Eacotts and all with access to Success Factor, payroll processors, auditors, accounting staff, HMRC Processors: Eacotts International Ltd Auditors: PwC
Time limit After which duration the processed personal data will or should have been deleted? Failing that, which duration would be necessary?	6 tax years of payroll required for HMRC excl bank details (but difficult to separate)

Transfer of personal data to third countries	Country(ies): UK/France/Switzerland
	Basis of the transfer (on what legal basis is the transfer based?): N/A
	Binding corporate rules: N/A
	Standard data protection clauses: N/A
	Other agreement (precise): N/A
	Other basis (precise): for the attention of the directors and financial controller of UK co and parent
Data collection method Please indicate how the data have been collected and provide supporting documents of the data collection method.	Consent of the data subject (indicate how the consent has been given): Provided by the employee when commencing employment
	Performance of a contract:
	Execution of a legal obligation:
	Other (precise):
Information Please indicate how the data subjects have been informed of the processing and, if so, precise the content and the form of the information and provide supporting documents of the providing information.	Employee is asked to provide during recruitment/onboarding process.
	Their rights over data not currently explained
Compliance actions Please indicate if compliance actions have been already carried out for the processing and provide the supporting documents.	Designation of a data protection officer: not at present
	Administrative formalities with the national personal data supervisory authority (i.e. CNIL for France): Eacotts is registered with the ICO in the UK
	Records of processing activities: None
	Internal policies (code of conduct, good practices, privacy policies for HR): Eacotts has confidentiality agreements with all staff & HR consultants
	Others (precise): N/A
Management of the rights of the data subjects Please indicate how you deal with the rights of the data subjects (access, rectification and erasure)	No system in place

HEALTH INSURANCE

A	B
Controller Please identify the controller of the processing	Entity name: Constellium UK Ltd Contact details Leila Sangar, 01628 665432, leilasangar@eacotts.com
Purpose(s) For what purposes has the controller decided to create the processing?	A process for managing the health insurance for the employees
Data subjects Who are the individuals whose data are processed? E.g. all employees, trainees, temp, job applicants etc.	Employees of Constellium UK Ltd
Personal data processed What categories of personal data are processed?	Identity: name, date of birth, address, contact number Personal info: medical information as disclosed on application
Recipient(s) Who can access to the processed personal data? E.g. HR staff, third society which is the processor of the processing etc. <u>NB: in case of a processor, please name the company and provide the contract between the controller and the processor.</u>	HR staff at Eacotts and all with access to Success Factor, payroll processors, auditors, accounting staff, HMRC, AXA Private Medical Care Processors: Eacotts International Ltd Auditors: PwC
Time limit After which duration the processed personal data will or should have been deleted? Failing that, which duration would be necessary?	We need to keep it for 6 years but in practice the records may be kept for longer
Transfer of personal data to third countries	Country(ies): UK/France/Switzerland Basis of the transfer (on what legal basis is the transfer based?): N/A Binding corporate rules: N/A Standard data protection clauses: N/A Other agreement (precise): N/A Other basis (precise): for the attention of the directors and financial controller of UK co and parent There is no basis: N/A
Data collection method Please indicate how the data have been collected and provide supporting documents of the data collection method.	Consent of the data subject (indicate how the consent has been given): Provided by the employee when commencing employment Performance of a contract: Execution of a legal obligation: Other (precise):

<p>Information Please indicate how the data subjects have been informed of the processing and, if so, precise the content and the form of the information and provide supporting documents of the providing information.</p>	<p>Employee is asked to provide during recruitment/onboarding process.</p> <p>Their rights over data not currently explained</p>
<p>Compliance actions Please indicate if compliance actions have been already carried out for the processing and provide the supporting documents.</p>	<p>Designation of a data protection officer: not at present</p> <p>Administrative formalities with the national personal data supervisory authority (i.e. CNIL for France): Eacotts is registered with the ICO in the UK</p> <p>Records of processing activities:None</p> <p>Internal policies (code of conduct, good practices, privacy policies for HR): Eacotts has confidentiality agreements with all staff & HR consultants</p> <p>Others (precise):N/A</p>
<p>Management of the rights of the data subjects Please indicate how you deal with the rights of the data subjects (access, rectification and erasure)</p>	<p>No system in place</p>

PENSION

A	B
Controller Please identify the controller of the processing	Entity name: Constellium UK Ltd Contact details Leila Sangar, 01628 665432, leilasangar@eacotts.com
Purpose(s) For what purposes has the controller decided to create the processing?	A process for managing the pension for the employees
Data subjects Who are the individuals whose data are processed? E.g. all employees, trainees, temp, job applicants etc.	Employees of Constellium UK Ltd
Personal data processed What categories of personal data are processed?	Identity: name, NI Number, date of birth, address Personal info: salary & pension contributions
Recipient(s) Who can access to the processed personal data? E.g. HR staff, third society which is the processor of the processing etc. <u>NB: in case of a processor, please name the company and provide the contract between the controller and the processor.</u>	HR staff at Eacotts and all with access to Success Factor, payroll processors, auditors, accounting staff, HMRC, Royal London Processors: Eacotts International Ltd Auditors: PwC
Time limit After which duration the processed personal data will or should have been deleted? Failing that, which duration would be necessary?	We need to keep it for 6 years but in practice the records may be kept for longer
Transfer of personal data to third countries	Country(ies): UK/France/Switzerland Basis of the transfer (on what legal basis is the transfer based?): N/A Binding corporate rules: N/A Standard data protection clauses: N/A Other agreement (precise): N/A Other basis (precise): for the attention of the directors and financial controller of UK co and parent There is no basis: N/A
Data collection method Please indicate how the data have been collected and provide supporting documents of the data collection method.	Consent of the data subject (indicate how the consent has been given): Provided by the employee when commencing employment Performance of a contract: Execution of a legal obligation: Other (precise):

<p>Information Please indicate how the data subjects have been informed of the processing and, if so, precise the content and the form of the information and provide supporting documents of the providing information.</p>	<p>Employee is asked to provide during recruitment/onboarding process.</p> <p>Their rights over data not currently explained</p>
<p>Compliance actions Please indicate if compliance actions have been already carried out for the processing and provide the supporting documents.</p>	<p>Designation of a data protection officer: not at present</p> <p>Administrative formalities with the national personal data supervisory authority (i.e. CNIL for France): Eacotts is registered with the ICO in the UK</p> <p>Records of processing activities:None</p> <p>Internal policies (code of conduct, good practices, privacy policies for HR): Eacotts has confidentiality agreements with all staff & HR consultants</p> <p>Others (precise): N/A</p>
<p>Management of the rights of the data subjects Please indicate how you deal with the rights of the data subjects (access, rectification and erasure)</p>	<p>No system in place</p>

LIFE COVER AND PERMANENT HEALTH COVER

A	B
Controller Please identify the controller of the processing	Entity name: Constellium UK Ltd
	Contact details Leila Sangar, 01628 665432, leilasangar@eacotts.com
Purpose(s) For what purposes has the controller decided to create the processing?	A process for managing the life insurance for the employees
Data subjects Who are the individuals whose data are processed? E.g. all employees, trainees, temp, job applicants etc.	Employees of Constellium UK Ltd
Personal data processed What categories of personal data are processed?	Identity: name, NI Number, date of birth, address Personal info: nominated beneficiary, medical insurance
Recipient(s) Who can access to the processed personal data? E.g. HR staff, third society which is the processor of the processing etc. <u>NB: in case of a processor, please name the company and provide the contract between the controller and the processor.</u>	HR staff at Eacotts and all with access to Success Factor, payroll processors, auditors, accounting staff, HMRC, Canada Life Processors: Eacotts International Ltd Auditors: PwC
Time limit After which duration the processed personal data will or should have been deleted? Failing that, which duration would be necessary?	We need to keep it for 6 years but in practice the records may be kept for longer
Transfer of personal data to third countries	Country(ies): UK/France/Switzerland
	Basis of the transfer (on what legal basis is the transfer based?): N/A
	Binding corporate rules: N/A
	Standard data protection clauses: N/A
	Other agreement (precise): N/A
	Other basis (precise): for the attention of the directors and financial controller of UK co and parent
Data collection method Please indicate how the data have been collected and provide supporting documents of the data collection method.	Consent of the data subject (indicate how the consent has been given): Provided by the employee when commencing employment
	Performance of a contract:
	Execution of a legal obligation:
	Other (precise):
Information	

<p>Please indicate how the data subjects have been informed of the processing and, if so, precise the content and the form of the information and provide supporting documents of the providing information.</p>	<p>Employee is asked to provide during recruitment/onboarding process.</p> <p>Their rights over data not currently explained</p>
<p>Compliance actions Please indicate if compliance actions have been already carried out for the processing and provide the supporting documents.</p>	<p>Designation of a data protection officer: not at present</p> <p>Administrative formalities with the national personal data supervisory authority (i.e. CNIL for France): Eacotts is registered with the ICO in the UK</p> <p>Records of processing activities:None</p> <p>Internal policies (code of conduct, good practices, privacy policies for HR): Eacotts has confidentiality agreements with all staff & HR consultants</p> <p>Others (precise): N/A</p>
<p>Management of the rights of the data subjects Please indicate how you deal with the rights of the data subjects (access, rectification and erasure)</p>	<p>No system in place</p>

AMEX CORPORATE CARD

A	B
Controller Please identify the controller of the processing	Entity name: Constellium UK Ltd Contact details Leila Sangar, 01628 665432, leilasangar@eacotts.com
Purpose(s) For what purposes has the controller decided to create the processing?	A process for the employees expenses using an American Express card
Data subjects Who are the individuals whose data are processed? E.g. all employees, trainees, temp, job applicants etc.	Employees of Constellium UK Ltd
Personal data processed What categories of personal data are processed?	Identity: name, first name, date of birth, address, contact number Personal info: bank details, personal expensiture
Recipient(s) Who can access to the processed personal data? E.g. HR staff, third society which is the processor of the processing etc. <u>NB: in case of a processor, please name the company and provide the contract between the controller and the processor.</u>	HR staff at Eacotts and all with access to Success Factor, auditors, AMEX Processors: Eacotts International Ltd Auditors: PwC
Time limit After which duration the processed personal data will or should have been deleted? Failing that, which duration would be necessary?	We need to keep it for 6 years but in practice the records may be kept for longer
Transfer of personal data to third countries	Country(ies): UK/France/Switzerland Basis of the transfer (on what legal basis is the transfer based?): N/A Binding corporate rules: N/A Standard data protection clauses: N/A Other agreement (precise): N/A Other basis (precise): for the attention of the directors and financial controller of UK co and parent There is no basis: N/A
Data collection method Please indicate how the data have been collected and provide supporting documents of the data collection method.	Consent of the data subject (indicate how the consent has been given): Provided by the employee when commencing employment Performance of a contract: Execution of a legal obligation: Other (precise):
Information	

<p>Please indicate how the data subjects have been informed of the processing and, if so, precise the content and the form of the information and provide supporting documents of the providing information.</p>	<p>Employee is asked to provide during recruitment/onboarding process.</p> <p>Their rights over data not currently explained</p>
<p>Compliance actions Please indicate if compliance actions have been already carried out for the processing and provide the supporting documents.</p>	<p>Designation of a data protection officer: not at present</p> <p>Administrative formalities with the national personal data supervisory authority (i.e. CNIL for France): Eacotts is registered with the ICO in the UK</p> <p>Records of processing activities:None</p> <p>Internal policies (code of conduct, good practices, privacy policies for HR): Eacotts has confidentiality agreements with all staff & HR consultants</p> <p>Others (precise): N/A</p>
<p>Management of the rights of the data subjects Please indicate how you deal with the rights of the data subjects (access, rectification and erasure)</p>	<p>No system in place</p>

COMPANY CAR

A	B
Controller Please identify the controller of the processing	Entity name: Constellium UK Ltd
	Contact details Leila Sangar, 01628 665432, leilasangar@eacotts.com
Purpose(s) For what purposes has the controller decided to create the processing?	A process for arranging hire cars for the employees
Data subjects Who are the individuals whose data are processed? E.g. all employees, trainees, temp, job applicants etc.	Employees of Constellium UK Ltd
Personal data processed What categories of personal data are processed?	Identity: name, first name, address, contact number
Recipient(s) Who can access to the processed personal data? E.g. HR staff, third society which is the processor of the processing etc. <u>NB: in case of a processor, please name the company and provide the contract between the controller and the processor.</u>	HR staff at Eacotts, SME Renewals, Lex Autolease Processors: Eacotts International Ltd
Time limit After which duration the processed personal data will or should have been deleted? Failing that, which duration would be necessary?	We need to keep it for 6 years but in practice the records may be kept for longer
Transfer of personal data to third countries	Country(ies): UK/France/Switzerland
	Basis of the transfer (on what legal basis is the transfer based?): N/A
	Binding corporate rules: N/A
	Standard data protection clauses: N/A
	Other agreement (precise): N/A
	Other basis (precise): for the attention of the directors and financial controller of UK co and parent
Data collection method Please indicate how the data have been collected and provide supporting documents of the data collection method.	Consent of the data subject (indicate how the consent has been given): Provided by the employee when commencing employment
	Performance of a contract:
	Execution of a legal obligation:
	Other (precise): N/A
Information	

<p>Please indicate how the data subjects have been informed of the processing and, if so, precise the content and the form of the information and provide supporting documents of the providing information.</p>	<p>Employee is asked to provide during recruitment/onboarding process.</p> <p>Their rights over data not currently explained</p>
<p>Compliance actions Please indicate if compliance actions have been already carried out for the processing and provide the supporting documents.</p>	<p>Designation of a data protection officer: not at present</p> <p>Administrative formalities with the national personal data supervisory authority (i.e. CNIL for France): Eacotts is registered with the ICO in the UK</p> <p>Records of processing activities:None</p> <p>Internal policies (code of conduct, good practices, privacy policies for HR): Eacotts has confidentiality agreements with all staff & HR consultants</p> <p>Others (precise):</p>
<p>Management of the rights of the data subjects Please indicate how you deal with the rights of the data subjects (access, rectification and erasure)</p>	<p>No system in place</p>

COMPANY MOBILE PHONE

A	B
Controller Please identify the controller of the processing	Entity name: Constellium UK Ltd Contact details Leila Sangar, 01628 665432, leilasangar@eacotts.com
Purpose(s) For what purposes has the controller decided to create the processing?	A process for managing the company phones of the employees
Data subjects Who are the individuals whose data are processed? E.g. all employees, trainees, temp, job applicants etc.	Employees of Constellium UK Ltd
Personal data processed What categories of personal data are processed?	Identity: name, first name, date of birth, address, contact number Personal info: Vodafone call records
Recipient(s) Who can access to the processed personal data? E.g. HR staff, third society which is the processor of the processing etc. <u>NB: in case of a processor, please name the company and provide the contract between the controller and the processor.</u>	HR staff at Eacotts and all with access to Success Factor, Vodafone Processors: Eacotts International Ltd
Time limit After which duration the processed personal data will or should have been deleted? Failing that, which duration would be necessary?	We need to keep it for 6 years but in practice the records may be kept for longer
Transfer of personal data to third countries	Country(ies): UK/France/Switzerland Basis of the transfer (on what legal basis is the transfer based?): N/A Binding corporate rules: N/A Standard data protection clauses: N/A Other agreement (precise): N/A Other basis (precise): for the attention of the directors and financial controller of UK co and parent There is no basis: N/A
Data collection method Please indicate how the data have been collected and provide supporting documents of the data collection method.	Consent of the data subject (indicate how the consent has been given): Implicit when accepting a corporate paid phone Performance of a contract: Execution of a legal obligation: Other (precise):
Information	Employee is asked to provide during recruitment/onboarding process.

<p>Please indicate how the data subjects have been informed of the processing and, if so, precise the content and the form of the information and provide supporting documents of the providing information.</p>	<p>Their rights over data not currently explained</p>
<p>Compliance actions Please indicate if compliance actions have been already carried out for the processing and provide the supporting documents.</p>	<p>Designation of a data protection officer: not at present</p> <p>Administrative formalities with the national personal data supervisory authority (i.e. CNIL for France): Eacotts is registered with the ICO in the UK</p> <p>Records of processing activities:None</p> <p>Internal policies (code of conduct, good practices, privacy policies for HR): Eacotts has confidentiality agreements with all staff & HR consultants</p> <p>Others (precise): N/A</p>
<p>Management of the rights of the data subjects Please indicate how you deal with the rights of the data subjects (access, rectification and erasure)</p>	<p>No system in place</p>