

## **Data Protection Information Notice for Employees and Candidates for the following Data Controllers**

### **BERMUDA**

Waystone Administration Solutions (BDA) Limited

### **CANADA**

Waystone Administration Solutions (CA) Inc

### **CAYMAN ISLANDS**

Waystone Corporate Services (Cayman) Ltd  
Waystone Governance Ltd.

### **HONG KONG**

Waystone Governance (HK) Limited

### **INDIA**

Waystone Technology Solutions Private Limited

### **IRELAND**

Waystone Financial (IE) Limited  
Sigma Irish Acquico Limited  
Waystone Centralised Services (IE) Limited  
Waystone Compliance Solutions (IE) Limited  
Waystone Corporate Services (IE) Limited  
Waystone Fund Management (IE) Limited  
Waystone Investment Management (IE) Limited  
Waystone Management Company (IE) Limited

### **LUXEMBOURG**

Waystone Administration Solutions (Lux) S.A.  
Waystone Management Company (Lux) SA

### **SWITZERLAND**

Waystone Fund Services (CH) SA

### **THE PHILIPPINES**

Waystone Centralised Services (Philippines) Inc.

### **SINGAPORE**

Waystone (SG) Pte Ltd  
Waystone Compliance Solutions (Singapore) Pte Ltd

### **UNITED ARAB EMIRATES**

Waystone Compliance Solutions (Middle East) Ltd

### **UNITED KINGDOM**

Waystone Transfer Agency Solutions (UK) Limited  
Waystone Capital Solutions (UK) Limited  
Waystone Compliance Solutions (UK) Limited  
Waystone Governance (UK) Limited  
Waystone Administration Solutions (UK) Limited  
Waystone Management (UK) Limited

### **USA**

Waystone Administration Solutions (US) Inc  
Waystone Compliance Solutions (US) Ltd.  
Waystone Governance (USA) Inc.

## Introduction

This Employee and Candidate Data Protection Information Notice (“**Notice**”) sets out details of how and why each of the aforementioned legal entities, (the legal entity names may change in the future due to mergers or acquisitions) who act as a ‘data controller’ and are part of the Waystone Group (“**Waystone**”, “**we**”, “**us**”, “**our**”), and third parties, collect and process personal information in connection with your enquiries or application for employment with Waystone or its affiliates, your employment with Waystone or its affiliates or associated interactions with us (our **relationship**). We do this in compliance with our obligations under applicable data protection law. This Notice explains what personal data is collected, the purposes for which it is processed, the third parties to whom it may be disclosed and how individuals can exercise their rights in relation to their personal data.

## About Us

Waystone is the controller of your personal data as part of our relationship. For the purposes of this Notice, Waystone means any of the legal entities within our group of related companies, subsidiaries, affiliates, shareholders and the parent company of our shareholders.

Waystone has a Global Data Privacy Team, to assist with all data privacy matters. In addition, we have appointed a Data Protection Officer (or equivalent) where we have a legal obligation to do so, in a particular jurisdiction and for certain prescribed processing activities. If you have any questions about the use of your personal data, your data protection rights or if you want to exercise those rights, please contact [dataprotection@waystone.com](mailto:dataprotection@waystone.com).

## Scope

This Notice applies to you, whether you are an applicant, a current (or former) employee, partner, worker, intern, transition year student, secondee, temporary worker, agency worker, consultant, individual contractor, applicant or director. It also applies to third parties whose information you provide to us in connection with our relationship with you (for example, in respect of emergency contact information). Please ensure that you provide a copy of this Notice to any third parties whose personal data you provide to us.

Where we refer to ‘employee personal data’ or ‘employment’ in this Notice, we do so for convenience only, and this should in no way be interpreted as purporting to confer employment status on non-employees to whom this Notice also applies. This Notice does not form part of any contract of employment and does not confer any contractual right on you or place any contractual obligation on us.

It applies to all personal data collected, maintained, transmitted, stored, retained, or otherwise used (i.e. processed) by us regardless of the media on which that personal data is stored.

This Notice reflects the requirements of Article 13 and 14 of Regulation (EU) 2016/679 General Data Protection Regulation (the ‘GDPR’), which is our base line for the protection of personal data in Waystone.

However, there may be differences in the way in which this protection is applied in the jurisdiction in which you are located, which, if not explicitly specified here, will be advised to you by the Data Privacy Team and the People & Development (“P&D”) team. You will find in Schedule 1 a list of data protection legislation that applies in our different jurisdictions. In the event of a conflict between the GDPR and the local data protection legislation, the local data protection legislation will prevail.

## Personal Data that we Process

‘Personal Data’ is defined as any data relating to a living individual who can be identified directly from that data or indirectly in conjunction with other information. We hold some or all of the types of personal data set out in Appendix 1, in relation to you.

Waystone collects personal data relating to you from you or from public sources in connection with our relationship, and to ensure compliance with our legal obligations. In addition, we may collect personal data relating to you from third party sources, such as specialist databases, or sources for vetting or screening purposes or fitness and probity assessments or from employment or credit reference agencies or previous employers. We collect this personal data to meet our requirements to comply with laws and regulations related to anti-money laundering, taxation, right to work and other applicable legislation. We may also collect special categories of data which will afford a higher level of protection.

Purposes of Processing and Legal Basis

We will process your personal data for the purposes for which it was initially collected, unless it is necessary to process it for another purpose that is compatible with the original purpose. In the event that we intend to process your personal data for a purpose that it is not related to the original purpose, we may obtain your explicit consent, or we will identify and rely upon a legal provision that authorises the new processing. The method and requirements for obtaining consent may vary depending on the jurisdiction in which you are located, and we will ensure compliance with local laws where applicable.

Personal data may be processed for the following purposes and on the legal grounds set out below:

Purpose	Legal Basis
<ul style="list-style-type: none"> <li>• processing your application with us and during the recruitment process, to assess your suitability for a role, establishing your identity and determining the terms on which you work with us and to manage an effective recruitment process;</li> <li>• during our relationship for normal P&amp;D management and administration purposes, ensuring that the terms and conditions of your appointment are properly adhered to and managed, to manage the relationship in accordance with relevant policies.</li> <li>• paying you and (where relevant) deducting tax and national insurance and other mandatory or optional contributions;</li> <li>• paying expenses that you have incurred during the course of your work with Waystone.</li> <li>• conducting performance reviews, managing performance and determining performance requirements including decisions about promotions and pay reviews;</li> <li>• to pay trade union premiums or register your status as a protected employee;</li> <li>• making decisions about our relationship, to properly manage the termination of our relationship and ensuring the termination of our relationship is in accordance with relevant policies;</li> <li>• maintaining appropriate business records;</li> <li>• ensuring network and information security, including preventing unauthorised access to our computer and</li> </ul>	<p>Processing is necessary to take steps at your request prior to entering into a contract;</p> <p>Processing is necessary for the performance of the employment contract;</p>

Purpose	Legal Basis
<p>electronic communications system and preventing malicious software distribution;</p> <ul style="list-style-type: none"> <li>• education, training and development requirements;</li> <li>• assessing your fitness to work, providing appropriate workplace adjustments, to monitor and manage sickness absence and to administer benefits</li> <li>• providing you with building and IT access</li> <li>• monitoring use of IT and communications in accordance with our information security policies and standards;</li> <li>• keeping attendance records;</li> <li>• organising business travel, accommodation, arranging visas and permits, conference and event management including offsites;</li> <li>• keeping records of gifts and entertainments offered and received;</li> <li>• providing compensation and benefit plans administration services, and assist Waystone and other Group Companies in discharging essential functions regarding its compensation and benefit plans;</li> <li>• providing health insurance for employees and their dependents; and</li> <li>• administering employment/contract termination.</li> </ul>	
<ul style="list-style-type: none"> <li>• for quality control, business and statistical analysis, market research or for tracking fees and costs or for customer service, training and related purposes;</li> <li>• sharing within Group Companies for the purposes of global processes, group-wide reporting and human resource management;</li> <li>• administering and monitoring your professional obligations;</li> </ul>	<p>Processing is necessary for the purposes of our legitimate interests<sup>1</sup> or the legitimate interests of a third party to whom your personal data is provided. We will not process your personal data for these purposes if our or the third party's legitimate interests should be overridden by your own interests or fundamental rights and freedoms. The</p>

<sup>1</sup> Legitimate Interest – as defined by GDPR

Purpose	Legal Basis
<ul style="list-style-type: none"> <li>• using closed-circuit television (CCTV) to assist in the investigation of security incidents and to promote and protect the health and safety of individuals;</li> <li>• using photographs on Waystone websites, Waystone materials and on certain applications such as email and Teams;</li> <li>• for staff welfare, cultural, sports and social programmes and activities;</li> <li>• providing references;</li> <li>• communicating with you pursuant to our constitution or circulating reports or other correspondence to you; responding to, evaluating or dealing with any queries, complaints or legal issues in relation to you;</li> <li>• undertaking internal and external audits, compliance monitoring and, where necessary, investigations;</li> <li>• In the context of a business or group company sale, re-organisation or restructuring or corporate finance activities;</li> <li>• Maintaining emergency contact details;</li> <li>• Accessing your email account during periods of leave or absence for purpose of ensuring we are aware of all business emails and that our records of business correspondence is complete;</li> <li>• Using room and desk booking software</li> <li>• Recording Teams calls, when indicated at the start of a meeting, for stated purposes;</li> <li>• Viewing/accessing your work calendar for the purpose of checking availability for work related tasks;</li> </ul>	<p>legitimate interests pursued by us in this regard include:</p> <ul style="list-style-type: none"> <li>○ Conducting our business in a responsible and commercially prudent manner and dealing with any disputes that may arise;</li> <li>○ Preventing, investigating or detecting theft, fraud or other criminal activity;</li> <li>○ Promoting Waystone, our services, capabilities, and employees;</li> <li>○ Pursuing our corporate and social responsibility objectives;</li> <li>○ Maintaining our client relationships.</li> </ul>
<ul style="list-style-type: none"> <li>• to ensure your health and safety at work,</li> </ul>	<p>Processing is necessary to comply with our legal obligations;</p>

Purpose	Legal Basis
<ul style="list-style-type: none"> <li>• establishing, exercising, defending or gathering evidence relating to any legal claims, litigation or grievance or disciplinary hearings;</li> <li>• complying with our legislative and regulatory obligations in connection with our dealings with you, including pension law, revenue law, health and safety law, right to work, taxation, crime-detection, prevention, investigation and prosecution, the prevention of fraud, bribery, anti-corruption, tax evasion, market abuse, conflicts of interest or equivalent, to prevent the provision of financial and other services to those who may be subject to economic or trade sanctions, in response to legal or court requests or requests from regulatory authorities or where it is in the public interest;</li> <li>• to communicate with you by way of notice pursuant to applicable legislation;</li> <li>• where required for tax reporting purposes;</li> <li>• equal opportunities monitoring;</li> <li>• to process your visa application and arrange insurance cover;</li> <li>• to afford natural justice and fair procedures (where relevant);</li> <li>• to submit applications for supervisory approval for certain prescribed roles in financial services.</li> </ul>	
<ul style="list-style-type: none"> <li>• to share personal data in exceptional circumstances eg for medical care purposes, and where you are incapable of giving consent.</li> </ul>	<p>In exceptional circumstances, where the processing is necessary to protect your vital interests (or someone else's interests).</p>
<ul style="list-style-type: none"> <li>• to process dependent visa applications;</li> <li>• office access control using biometrics;</li> <li>• driver collection and drop off using home address;</li> <li>• receiving birthday greetings;</li> <li>• get well/celebratory greetings using home address.</li> </ul>	<p>In certain limited circumstances, your consent.</p>

### How we use special categories of personal data

Waystone will not process special category personal data<sup>2</sup>, unless one of the following circumstances is met:

- Where it is necessary for the purposes of complying with our obligations and exercising our specific rights, or yours, in the field of employment and social security and social protection law; where it is necessary to protect your vital interests or that of someone else where the data subject is physically or legally incapable of giving consent;
- Where it is needed in the public interest, or is requested by a law authority;
- Where it is needed to assess your working capacity on health grounds, subject to appropriate confidentiality safeguards;
- Where it is necessary for the purpose of or in connection with any legal claims and proceedings, or to obtain legal advice.
- Where you have already made the information public;
- Where Waystone is subject to a due diligence process and provides professional experience details of senior management or key individuals in the business; and
- In certain circumstances with your explicit written consent.

### Security and Storage of Personal Data

We securely store your personal data in a centralised database, with controlled access to that database. Access to personal data (including special category personal data) in both electronic and paper form is restricted to members of the P&D Team and employees who have a legitimate and justifiable reason to view such data.

### Recipients of Data

Your personal data may be disclosed to various recipients in connection with the above purposes, including:

- Your reporting Manager, other members of the Executive Team, the P&D teams within the different Waystone entities, across all our jurisdictions;
- Other Waystone entities who are either the provider or recipient of intragroup services;
- The Board of Waystone and (in circumstances where there is legitimate interest, performance of a contract or legal obligation) other employees, in relation to the P&D activities of Waystone;
- Third parties who may assist us with recruitment;
- Third parties to assist in the administration, processing and management of certain activities pertaining to past, current and prospective employees e.g. employee share option schemes, payroll providers, pension and health insurance providers, pensions trustee;
- Individuals or companies employed by Waystone in respect of business travel, accommodation and event organisation;

---

<sup>2</sup> See Appendix 1 for more information about special categories of personal data.

- Health Insurance providers;
- Auditors;
- Trade Unions (if applicable in your jurisdiction);
- Tax authorities in your jurisdiction as required by applicable law;
- Financial regulators in your jurisdiction including but not limited to the Central Bank of Ireland, Cayman Islands Monetary Authority, the Financial Conduct Authority, National Futures Association, Commission de Surveillance du Secteur Financier, Dubai Financial Services Authority (DIFC), the Malta Financial Services Authority, the Financial Services Regulatory Authority (ADGM) in the UAE, Monetary Authority of Singapore and Securities & Futures Commission;
- Industrial relation bodies or tribunals, Courts, mediation bodies, pension authorities in your jurisdiction and Court-appointed persons;
- Relevant and applicable Government departments and agencies in your jurisdiction;
- Other third parties who we engage to provide services to us, such as building landlords, professional advisers, independent investigators, insurers, occupational health specialists, legal advisers, auditors, IT consultants, IT providers and IT software as a service (SaaS) providers;
- Screening and other reference agencies in order to carry out identity and money laundering checks to comply with legal and regulatory obligations;
- Other third parties in order to obtain pre-employment references from other employers and where we are requested to provide references to future employers;
- Learning and development providers e.g. professional bodies, external training, conferences organisers;
- Relatives or legal representatives of past, current and prospective employees; and
- Potential purchasers or bidders of Waystone.

### Transfers Abroad

In connection with the above purposes your personal data may be transferred, stored and processed outside of the jurisdiction where you have applied or where you are employed.

This may be to a jurisdiction which is not recognised by the European Commission or other data protection supervisory authorities outside the EU, as providing for an equivalent level of protection for personal data as that in the GDPR or their local legislation.



Waystone operates globally and these jurisdictions may include the United States of America, the Cayman Islands, Bermuda, the United Arab Emirates and Asia. If and to the extent that we do transfer data to these locations, we will ensure that appropriate measures are in place to protect the privacy and integrity of such personal data and in particular will comply with our obligations under GDPR or other local data protection legislation, governing such transfers, which may include:

(a) entering into a contract governing the transfer which contains the “standard contractual clauses” approved for this purpose by the European Commission or other local data protection supervisory authorities; or

(b) transferring your personal data pursuant to binding corporate rules. As of the date of this Notice, Waystone do not have approved binding corporate rules.

### Retention

We will retain your personal data for the duration of our relationship and for such a period of time as required to satisfy the purpose for which the data was collected and used, unless a longer period is necessary to comply with our obligations under applicable law and, if relevant, to deal with any claim or dispute that might arise. This means that for employees we will retain your data for a period of seven years post-termination of your employment contract, and for unsuccessful candidates for twelve months from the date the position was filled (or longer if there is a claim of legal action), in accordance with our record retention policy.

### Automated decision-making

Automated decision-making refers to the process where decisions are made by systems or algorithms without direct human intervention.

You will not be subject to any decisions with a significant impact on you that are based solely on automated decision-making processes unless we have a lawful basis for such actions and have provided you with appropriate notice. At this time, we do not anticipate that any decisions regarding you will be made using automated means. However, should this position change, we will notify you accordingly.

### Your Rights

You have the following rights, in certain circumstances and subject to applicable exemptions, in relation to your personal data:

- the right to information about our processing of your personal data;
- the right to access the personal data processed;
- the right to rectify any inaccuracies in your personal data;
- the right to have any incomplete personal data completed;
- the right to erase your personal data (in certain specific circumstances);
- the right to request that your personal data is no longer processed for particular purposes (in certain specific circumstances);

- where the legal basis for processing is consent, the right to withdraw your consent at any time;
- the right to object to the use of your personal data or the way in which it is processed where we have determined it to be necessary for the purposes of our legitimate interests;
- the right to data portability (in certain specific circumstances);
- the right not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects concerning you or similarly significantly affects you (in certain specific circumstances);
- to lodge a complaint with a supervisory authority, in particular in the European Member State of your habitual residence, place of work or place of the alleged infringement if you consider that the processing of personal data relating to you infringes the GDPR, or your local data protection legislation. A list of the relevant supervisory authorities and their contact information is included in Appendix 2.

However, not all of these rights are absolute and may be restricted in certain circumstances prescribed by the GDPR and/or the applicable data protection legislation in your jurisdiction. We will advise you if such circumstances arise in relation to your request to exercise your rights.

If you wish to exercise any of your rights in this regard, please contact [dataprotection@waystone.com](mailto:dataprotection@waystone.com). We will acknowledge your request and endeavour to respond to your request within one month. That period may be extended by two further months where necessary, taking into account the complexity and number of requests. If this is the case, you will be informed. We may request proof of identification to verify your request, if necessary.

#### What happens if you do not provide us with your information

If we believe that we require relevant information to effectively and properly manage our relationship, we may not be able to continue our relationship with you, e.g. process your job application or (in certain circumstances) to pay you or administer your pension, if you decline to provide us with that personal data. We will tell you when we ask for information which is a statutory or contractual requirement or needed to comply with our legal obligations.

#### Changes to this Notice

We reserve the right to update this Notice at any time. We will provide an updated Notice to employees through the usual internal channels which are in use at the time of said update. For those who were applicants but not employees or those who are no longer employees we will provide a copy of the Notice on reasonable request to the P&D Team.

#### Further Information

If you require any further clarification regarding this Notice, please contact either a member of your local P&D Team or contact [dataprotection@waystone.com](mailto:dataprotection@waystone.com).

## Appendix 1

### General Personal Data

**Personal** – Recruitment related data and information on your personnel file - these include your name, signature, postal address, email address, mobile and land line numbers, fax number, date and place of birth, nationality, equal opportunities, credit history, references, work and educational history, right to work documentation, passport number, utility bills, photographic identification and verification such as copies of your passport, passport number, gender, drivers licence, photographs, emergency contact details, marital status, next of kin and family details.

**Professional** – Curriculum Vitae and/or application form, cover letter, previous employment background, references from previous employers, background reference check including credit check, directorships, shareholdings, record of interview/interview notes, selection and verification records, psychometric tests, educational details, professional and/or academic transcripts, professional certifications, special skills, information about disciplinary and grievance process, language skills, memberships of committees or other bodies.

**Employment** – work contact details (corporate email address and telephone number), identification number, photograph, videos, business cards, details regarding the job function, primary work location, start date, working hours, employment status, your terms and conditions of employment or engagement, contract of employment, trade union membership and deductions, notice period, signed confidentiality agreement, immigration status, visa, relocation assistance including taxation, work permit details, job description, history and details of current position, employee survey data.

**Premises and IT access** – information required to access company systems and applications such as email account and system passwords, login and access records, download and print records, call recordings, records of email and internet usage in accordance with our email and internet policy, CCTV images captured through the legitimate use of CCTV within Waystone, car type and registration plate.

**Fees, remuneration and benefits** – fees/payment and benefits package, base salary, bonus, compensation type, long term incentives, employee share option schemes, long service, pension scheme, PRSA, health insurance scheme (and any third-party beneficiaries), company credit card data, salary reviews, payment of expenses.

**Travel** – Organising business travel, accommodation, arranging visas and permits; passports, dates of travel, flights, car and taxi hire, hotels, meal, dietary requirements, entertainment, credit cards and out of pocket expenses.

**Leave** – including documentation which may be provided in connection with any statutory leave, sick leave, holiday and family related leave records such as maternity, carer's, parental and adoptive, garden leave, and any other type of leave such as study leave, force majeure.

**Payroll information** – these include your PPS/national insurance number, bank account details, salary arrangements, bonus entitlements and tax allowances.

**Performance, grievance and disciplinary details** – these include performance and grievance review forms, notes from performance review and grievance investigation meetings, performance improvement and grievance plan documentation, witness statements, complaints.

**Training and development** – such as data relating to training and development needs, or training received.

**General correspondence/meetings** – relating to grievance and/or disciplinary processes, misconduct or performance issues, data arising in connection with litigation and complaints, involvement in incident reporting and disclosures.

**Health & safety** – nature of incident, injuries and remediation.

**Incapacity** - any accommodations or adjustments in connection with any incapacity.

**Legal & regulatory –**

- securities trading information including information relating to family members and other accounts under employees' control, details of any shares of common stock or directorships;
- Information about outside activities for employees and family members;
- Information about gifts received/given for the employee and family members; and
- Information about potential conflicts with your family members that impact on your role or with Waystone in general;
- Provision of current staff data to whistleblower service provider;
- Documentation containing information relating to Politically Exposed Persons, Financial checks, Bankruptcy, Sanction Lists screening, and Directorship History;
- Letter of Authority;
- Criminal record details, where required for regulatory fitness and probity requirements.

**Information obtained through electronic means** – these include emails stored in your work email inbox, data relating to your internet browsing history, your use of devices and Apps installed on these devices, your IP address.

**Pension details** – these include Pension Benefit Contract and Employee plan numbers.

**Termination of our relationship** – these include resignation letters, exit interviews and reference letters.

**Call recordings** – We may collect and process personal data relating to you in connection with our relationship, such as via correspondence and calls. Telephone and videoconference calls with you may be recorded for the purposes of record keeping, security and training.

### **Special Categories of Personal Data**

Medical/health information– these include sick certificates, sick leave records, sick pay records, occupational health assessments and health insurance membership applications which may include health information of employees and dependencies.

Special categories of more sensitive personal information – information about your race or ethnicity, religious beliefs, sexual orientation and political opinions, membership of a trade union or equivalent industrial relations body, information about criminal convictions and offences, genetic information and biometric data.

## Appendix 2

### List of jurisdictions where Waystone has a presence and the applicable data protection legislation and supervisory authorities

Country	Legislation	Supervisory Authority
Ireland	Data Protection Act 2018, the GDPR	<a href="#">Data Protection Commission</a>
United Kingdom	Data Protection Act 2018, the "UK GDPR"	<a href="#">Information Commissioners Office</a>
Luxembourg	Act of 1 August 2018, the GDPR	<a href="#">Commission nationale pour la protection des données</a>
Switzerland	Federal Act on Data Protection 2020 ("FADP")	<a href="#">Federal Data Protection and Information Commissioner</a>
Cayman Islands	Data Protection Act (2021 Revision), Data Protection Regulations 2018 (SL 17 of 2019)	<a href="#">Ombudsman Cayman Islands</a>
Bermuda	Personal Information Protection Act 2016	<a href="#">The Office of the Privacy Commissioner for Bermuda</a>
Canada	Personal Information Protection & Electronic Documents Act 2000, Privacy Act 1985	<a href="#">Office of the Privacy Commissioner of Canada</a>
Singapore	Personal Data Protection Act 2012	<a href="#">Personal Data Protection Commissioner</a>
Hong Kong	Personal Data (Privacy) Ordinance (Cap. 486) as amended in 2021	<a href="#">Office of the Privacy Commissioner</a>
United Arab Emirates	DIFC Data Protection Law No.5 of 2020, Data Protection Regulations 2021	<a href="#">The Commissioner of Data Protection (DIFC)</a> <a href="#">Office of Data Protection (ADGM)</a>
California, USA	California Consumer Privacy Act of 2018, as amended by the California Privacy Act of 2020	<a href="#">California Privacy Protection Agency</a>
Philippines	The Data Privacy Act of 2012 (Republic Act No. 10173)	<a href="#">The National Privacy Commission</a>
India	The Digital Personal Data Protection Act 2023	Data Protection Board of India