DHGL Limited Employee Privacy Notice

1 Introduction

DHGL Limited ("we", "us") has created this data protection notice as the controller of employees' personal data to demonstrate our firm commitment to privacy and to inform employees about the information we collect and process in connection with your employment. If you have any queries about this notice, please contact dataprotection@dalatahotelgroup.com

This notice should be read alongside related policies, including the Data Retention Policy, CCTV Policy and IT Acceptable Use Policy.

2 Scope

This notice applies from the recruitment stage, throughout the employment relationship, and following termination of employment.

3 Summary of Processing Activities

The table below sets out, in a transparent and accessible manner, the main purposes for which employee personal data is processed, the legal basis relied upon, and the applicable retention period. More detailed information on data categories and recipients is contained in DHGL Limited's Records of Processing Activities.

Table 1 Employee Data Processing Overview

Purpose of Processing	Description of Processing Activity	Legal basis and special category condition	Retention Period
Recruitment and selection	Managing applications, shortlisting, interviews, references, vetting and appointment	Contract (pre-contractual steps); Legitimate interests	Unsuccessful candidates: up to 12 months from decision date; successful candidates: incorporated into personnel file
Employment contract management	Managing contracts, terms and conditions, working hours, leave, attendance and benefits	Contract; Legal obligation	Duration of employment plus 7 years
Payroll and expenses	Payment of salary, expenses, deductions, pensions and benefits	Contract; Legal obligation	7 years after end of employment
Statutory compliance	Compliance with employment, tax, social protection, health and safety and immigration law	Legal obligation	As required by statute (generally 6–7 years)

Purpose of Processing	Description of Processing Activity	Legal basis and special category condition	Retention Period
Performance management	Appraisals, performance reviews, improvement plans and succession planning	Contract; Legitimate interests	Duration of employment plus 3 years
Learning and development	Training records, qualifications and professional development	Contract; Legitimate interests	Duration of employment plus 3 years
Health and absence management	Sick leave, occupational health, fitness to work and workplace accommodations	Legal obligation; Employment law obligations (Article 9(2)(b))	Absence records: 7 years; occupational health reports: duration of employment plus 6 years
Workplace investigations	Managing disciplinary, grievance, bullying and harassment matters	Legal obligation; Legitimate interests	Duration of process plus 6 years
Security, safety and crime prevention	Operation of CCTV systems to monitor and record individuals on the premises for security, safety, crime prevention and incident investigation.	Legitimate interests (Article 6(1)(f) GDPR) in protecting staff, visitors and property, and preventing and investigating criminal activity.	Up to 30 days, unless required for an incident investigation, legal proceedings or compliance with a legal obligation. Relevant footage is then retained for as long as necessary and securely deleted.
IT and communications	Management and security of email, systems and networks	Legitimate interests	Up to 12 months, unless required for investigation
Pay audits and job architecture	Job evaluation and pay transparency analysis (including SkillsTrust)	Legal obligation; Contract	Duration of audit plus 6 years
Termination of employment	Managing resignation, dismissal, redundancy and exit processes	Contract; Legal obligation; Legitimate interests	7 years after end of employment
Surveys	Collection and analysis of customer and/or employee feedback to improve services, operations, and experience	Legitimate Interests (Article 6(1)(f) GDPR)	24 months from date of collection, then anonymised or deleted

Where personal data is processed for a new purpose that is incompatible with those listed above, employees will be informed in advance.

4 How your information is shared

Your information may be disclosed to third parties where we are legally obliged to do so or where our employment contract requires or permits us to do so. For example, we pass on certain information to

our external payroll provider, pension, benefit, health insurance providers and in exceptional circumstances during a Transfer of Undertakings (protection of employment) (TUPE) within the due diligence process.

5 Special Category Data

Certain processing activities involve special category personal data, including health data and biometric data. Such data is processed only where necessary and subject to appropriate safeguards, relying on Article 9 GDPR conditions, including employment law obligations and explicit consent where required.

6 Automated Decision Making and AI

Employees are not subject to decisions based solely on automated processing that produce legal or similarly significant effects. Where AI tools are used in HR or operational contexts, these are subject to human oversight and are not used as the sole basis for employment-related decisions.

7 Data Sharing and International Transfers

Employee personal data may be shared with internal departments and trusted third-party service providers where necessary. Where data is transferred outside the EEA or UK, appropriate safeguards are implemented.

8 Retention of Personal Data

Personal data is retained only for as long as necessary to fulfil the relevant purpose and to comply with legal obligations. Detailed retention periods are set out in DHGL Limited's Data Retention Policy.

9 Employee Rights

Under data protection law, including the EU and UK General Data Protection Regulation and the Data Protection Act 2018, employees have the following rights in relation to their personal data. These rights are not absolute and may be subject to legal limitations or exemptions.

Right of access
You have the right to request confirmation as to whether we process personal data about you and, where this is the case, to access that personal data and receive information about how it is processed.

Right to rectification
You have the right to request that inaccurate personal data is corrected and that incomplete personal data is completed.

Right to erasure
You have the right to request the deletion of your personal data where there is no lawful basis for continuing to process it, subject to statutory retention obligations and other legal constraints.

Right to restriction of processing
You have the right to request that the processing of your personal data is restricted in certain circumstances, for example where you contest the accuracy of the data or object to the processing.

Right to object
Where processing is based on legitimate interests, you have the right to object to such processing. We will stop the processing unless we can demonstrate compelling legitimate grounds which override your interests, rights and freedoms.

Right to data portability
Where processing is based on consent or contract and carried out by automated means, you have the right to receive your personal data in a structured, commonly used and machine-readable format and to request its transfer to another controller, where technically feasible.

Right to withdraw consent
Where we rely on your consent to process personal data, you have the right to withdraw that consent at any time. Withdrawal of consent will not affect the lawfulness of processing carried out before the consent was withdrawn.

Right not to be subject to automated decision-making
You have the right not to be subject to a decision based solely on automated processing, including profiling, which produces legal or similarly significant effects concerning you. Where such processing takes place, you have the right to request human intervention, express your view and contest the decision.

Requests to exercise your rights should be submitted to dataprotection@dalatahotelgroup.com. We may need to verify your identity before responding. Requests will be dealt with without undue delay and within the time limits prescribed by law.

10 Contact Details

If you have any questions, concerns or requests relating to this Employee Privacy Notice or how your personal data is processed, please contact:

dataprotection@dalatahotelgroup.com

DHGL Limited has a central data protection team responsible for managing data protection compliance and handling employee queries confidentially and in accordance with applicable law.

If you are not satisfied with the response you receive, you have the right to lodge a complaint with the relevant supervisory authority:

- **Ireland**: Data Protection Commission (DPC)
  www.dataprotection.ie
- **United Kingdom**: Information Commissioner's Office (ICO)
  www.ico.org.uk
- **Germany**: Federal Commissioner for Data Protection and Freedom of Information (BfDI), or the relevant German state supervisory authority (Landesdatenschutzbehörde) for your place of work
  www.bfdi.bund.de

- **Netherlands**: Autoriteit Persoonsgegevens (AP)
  www.autoriteitpersoonsgegevens.nl
- **Spain**: Agencia Española de Protección de Datos (AEPD)
  www.aepd.es

This notice will be reviewed periodically and updated where necessary to reflect changes in law or business practices.