

PRIVACY NOTICE ADDENDUM FOR DAYFORCE CLOCKS

About this privacy notice addendum

This privacy notice addendum provides additional information on how NG Bailey Group of Companies (“NG Bailey”) collects and processes personal data via ‘Dayforce Clocks’ and should be read in conjunction with NG Bailey’s Privacy Notice for Website and Digital Platform Users which is available to view in its latest form i) on our website www.ngbailey.com or, ii) on the NG Bailey electronic quality management system held on NG Bailey’s Intranet (employees only) or, iii) on request to data@ngbailey.co.uk.

The collection, processing and transfer of personal data is governed by the Data Protection Act 2018 and UK General Data Protection Regulation (“UK GDPR”). Personal data means any information about an individual from which that person can be identified. All information that is obtained about you will be processed by NG Bailey in accordance with UK GDPR and as explained in this notice addendum.

Dayforce is a digital system used by NG Bailey for the purpose of managing employment, payroll, training/certification and time & attendance records.

‘Dayforce Clocks’ is an extension to the Dayforce system and is a physical device used to record your attendance and site security at a specific location when you are working at that location on behalf of NG Bailey. Attendance is determined via personal data provided by you at the Dayforce Clock. As explained in more detail below, the purposes for implementing Dayforce Clocks are to enable efficiencies in access to and from specific work sites, administration relating to pay, health and safety and site security.

This privacy notice addendum, read in conjunction with NG Bailey’s Privacy Notice for Website and Digital Platform Users, explains what personal information we may collect about you via these Dayforce Clocks, how we may use it, and the steps we take to ensure that it is kept secure. We also explain your rights in respect of your personal data.

This notice addendum applies to NG Bailey employees, agency workers and suppliers’ personnel working at specified locations at the request of NG Bailey.

We may update this notice addendum at any time, which will be available to view in its latest form, at any time i) on our website www.ngbailey.com or, ii) on the NG Bailey electronic quality management system held on NG Bailey’s Intranet (employees only) or, iii) on request to data@ngbailey.co.uk.

What information may be stored and processed

The Dayforce Clocks may capture the following categories of personal data from you:

- A digital ‘reference’ representation of your fingerprint(s)/finger vein pattern(s) (“Reference Biometric Data”) which is stored on the Dayforce Clock(s) and also within the Dayforce system. The information cannot be used to determine a person’s actual fingerprint/vein pattern
- A photograph of you (the individual) at the Dayforce Clock when recording your attendance (“Clocking Photographs”), which is stored on the Dayforce Clock(s) and also within the Dayforce system.

How we use your data and why

The personal data captured on the Dayforce Clocks is used for the following purposes:

- Clocking Photographs and Reference Biometric Data - to support NG Bailey's accountability for safety and security (employees, agency and supplier personnel) by knowing who is working at specific work locations and to prevent unlawful access
- Reference Biometric Data - To support NG Bailey's accountability for accurate payment of wages and adherence to working time directive (employees and agency) including prevention of other parties tampering with the captured data
- Reference Biometric Data - Performance of a contract (with our suppliers and agency workers) by knowing hours worked at specific work locations on behalf of NG Bailey.

Pursuant to the UK GDPR, NG Bailey is permitted to process this personal data to pursue the above legitimate interests provided your interests and fundamental rights do not override those interests.

Under the UK GDPR this form of biometric data is classified as 'sensitive data' and is subject to a higher level of protection:

- a. Clocking Photographs – We have a legitimate interest in processing this personal data as part of our security identification systems as it is in the public interest for the purpose of detecting and preventing crime and for the protection of health and safety of those within each work location
- b. Reference Biometric Data - We will only process this personal data with your consent (further details provided in the section headed "Your consent" below).

Your consent

Your consent will be obtained before initial capture of Reference Biometric Data. Before Reference Biometric Data is captured you will be asked to provide digital consent on the Dayforce Clock.

You have the right to withdraw your consent at any time by notification (which must be confirmed in writing / email) to your line manager, contract manager or data@ngbailey.co.uk

If consent is not given or is withdrawn, then an alternative means will be provided for you to confirm your identity and presence at a Dayforce Clock. The alternative means will either be an access/security card or a unique reference number which you will need to preset at/key into the Dayforce Clock.

Who will we share this information with

The captured data will only be shared with Dayforce (including their subsidiaries and contractors) for the purpose of managing the Dayforce system used by NG Bailey for time and attendance, HR and payroll purposes.

NG Bailey's assurance to you

All personal information that is obtained from you will be processed by NG Bailey in accordance with UK GDPR and shall be processed by NG Bailey as explained in this notice.

The personal data that you share will be processed by our third-party service provider, Dayforce, on whose system the Dayforce Clocks are operated. Dayforce are required to take appropriate security measures to protect your personal information in line with UK GDPR. We do not allow Dayforce to use your personal data for their own purposes. We only permit them to process your personal data for specified purpose detailed in this notice addendum and in accordance with our instructions.

How long will we hold this information

- All Reference Biometric Data will be deleted on the live Dayforce system within 14 days of your employment, contract or engagement with NG Bailey terminating
- Clocking Photographs will be deleted on the live Dayforce system after 31 days
- Reference Biometric Data and Clocking Photographs may remain on: Dayforce system backups accessible by Dayforce for up to 12 months
- NG Bailey test systems accessible to NG Bailey for 3 months.

Your rights

In addition to your right to refuse or withdraw your consent (further details provided in the section headed "Your consent" above), under the UK GDPR you have a number of other 'rights' in respect of your personal information which are further explained in NG Bailey's Privacy Notice for Website and Digital Platform Users.

These rights include the right to request that any existing biometric or photographic data relating to yourself be erased from the Dayforce Clocks and Dayforce system. Note that we may not always be able to comply with your erasure request for specific legitimate interest or legal reasons which will be notified to you, if applicable, at the time of your request.

Who should you contact and where to make a complaint

If you would like to speak to someone about the UK GDPR, your personal data and your rights, or wish to exercise any of your rights, you should direct your questions to data@ngbailey.co.uk.

If you prefer to speak directly to the Information Commissioners Office (ICO) then they can be reached at www.ico.org.uk and on the contact details below.

If you have a complaint regarding any aspect of your personal data or this privacy notice, please email: data@ngbailey.co.uk

You also have a right at any time to make a complaint to the ICO. The ICO's contact details are:

Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF

Helpline number: 0303 123 1113

ico.org.uk/make-a-complaint/

We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please do contact us in the first instance, and we shall endeavour to resolve your complaint. Concerns or complaints can be raised internally addressed to data@ngbailey.co.uk.

Version Control

Version	Last Amended	Author	Action Taken
1.0	Jan-2025	Emma Judge & Jonathon Royle	Document Created