



Employee Privacy Notice

Wirex Holdings Limited

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WIREX EMPLOYEE PRIVACY NOTICE

1. Purpose and Application

Wirex respects individuals' rights to privacy and to the protection of personal data. As employees, contractors, or agents of Wirex you may be required to provide the Company with your personal information for the purposes of your employment. This data privacy, use, and retention notice (the "Privacy Notice") describes Wirex's collection, use, processing and disclosure of the personal data we collect from you in the course of your employment and applies to personal data used, processed, collected and disclosed by the Wirex group, its subsidiaries, affiliates, associated companies and jointly controlled entities (collectively "Wirex", "the Company", "we", "our" or "us").

This notice applies to current and former employees, workers, volunteers, interns, and contractors.

2. Collection of Personal Data

When we collect personal data

Wirex may collect your personal data:

- During the recruitment/application process for any role/position within Wirex;
- At the interview process for any role/position within Wirex;
- In the course of finalizing your employment with Wirex;
- During the course of your onboarding with Wirex;
- When conducting background checks prior to or during your ongoing employment with Wirex;
- As part of routine personal information reviews throughout your employment with Wirex.

What we collect

"Personal data" refers to any data collected by us which can be used to identify an individual or from which an individual may be identified from. This includes but is not limited to:

- a. basic personal data, including name and address, date of birth, marital status, and personal contact details.
- b. information on next of kin, including relationship and emergency contact information.
- c. insurance, social security, or pension information.
- d. information on your immigration status, right of work, visas, or related residence and employment permits.
- e. employment history, including job titles, work history, employment location, working hours, training records, performance information, disciplinary and grievance records, and professional memberships.
- f. education history, including schools attended, test/exam results, professional qualifications, and assessments.
- g. financial information, including bank account information, compensation history, benefits, and bonuses.

- h. visual images and personal appearance (such as copies of identification documents, passport photographs, CCTV footage at the workplace).
- i. online profile and social media information and activity, based on your public profiles (i.e. LinkedIn).
- j. information about your use of our information and communications systems.

We may also collect and process certain sensitive or special categories of data for specific and limited purposes, such as background screening, or providing employment benefits:

- Criminal history and political affiliation, where it is relevant for our regulatory and/or legal obligations.
- Health data, including medical conditions, health, and sickness records (including occupational health records).
- Information concerning your credit history such as financial credit reports, bankruptcy records.
- Trade union membership.
- Information about your race or ethnicity, and religious beliefs.

We will only process special category data where we've obtained your explicit consent or are otherwise lawfully permitted to do so.

How we collect data

Wirex may collect personal data through any of the following methods:

- a. Online job application forms or CVs submitted online submitted directly by you;
- b. Through employment agencies or recruiters;
- c. Background check agencies;
- d. References;
- e. Former employers;
- f. Information that we receive from third parties – credit reference, fraud prevention or government agencies;
- g. Information that we learn about you through your employment with Wirex, including health-related information gathered;
- h. Information that we gather from the technology which you use in the course of your employment (for example location data from your mobile phone, or an IP address or telephone number) and how you use it (for example pattern recognition);
- i. Information that we gather from publicly available sources, such as social media, news reports, international blacklists.

3. Lawful Basis of Processing

Lawful Basis

We only collect and use personal information about you when the law allows us to. Most commonly, we use it where:

- The data subject (you) has given consent to the processing activity taking place.

- If the processing is necessary for the performance of a contract
- If the processing is necessary for compliance with a legal obligation to which the controller is subject
- If the processing is necessary for the purpose of the legitimate interest pursued by us or our partners.

Where legitimate interest is identified as a lawful basis, we will undertake a legitimate interest assessment which is a three-part test covering:

The purpose test – to identify the legitimate interest

Necessity test – to consider if the processing is necessary for the purpose identified

Balancing test – considering the individual's interests, rights, or freedoms and whether these override the legitimate interests identified.

4. Use, Processing and Disclosure of Personal Data

Purposes

We will only use and share your information where it is necessary for us to effectively carry out our obligations under our employment agreement with you and to comply with our legal obligations in the jurisdictions where we provide services in. Your information may be shared with and processed by other Wirex group companies only where necessary to meet these obligations. We want to ensure that you fully understand how your information may be used.

Wirex will use, process, and/or disclose your personal data only for the following purposes:

- Deciding on your recruitment or appointment
- Assessing your qualification for a role/employment
- Pre-employment and ongoing post-employment background checks
- Determining the terms on which you work for us
- Checking if you are legally entitled to work for the Wirex entity hiring you
- Paying you, and if you are an employee, deducting tax and other applicable contributions
- Providing benefits including healthcare, pension
- Administering our obligations under your employment/engagement contract
- Business management and planning, including accounting and auditing
- Conducting performance reviews, managing performance, and determining performance requirements
- Making decisions on compensation
- Gathering evidence for possible grievance or disciplinary hearings
- Making decisions on your continued employment/engagement or the termination thereof
- Education, training, and development requirements
- Dealing with legal disputes which involve you which arise in the course of your employment
- Ascertaining your fitness to work and managing sickness absence, including consulting with third parties such as occupational health
- Complying with health and safety obligations

- To prevent fraud
- To monitor your use of our information
- To ensure network and information security, including preventing unauthorised access to our computer and electronic communications systems and preventing malicious software distribution
- To conduct data analytics studies to review and better understand employee retention and attrition rates.
- Equal opportunities monitoring

Disclosures

Subject to the provisions of any applicable law, your Personal Data may be disclosed by Wirex, for any of the purposes listed above (where applicable), to the following entities or parties, whether they are located overseas or in the country of the Wirex entity you are employed with:

- the various entities within Wirex;
- agents, contractors or third party service providers who provide operational services operations, payroll, employee benefits, e-learning, training, insurance to Wirex;
- any business partner, investor, assignee, or transferee (actual or prospective) to facilitate business asset transactions (which may extend to any merger, acquisition, or asset sale) involving any of Wirex;
- IT and software services;
- our professional advisers such as consultants, auditors, and lawyers;
- relevant government ministries, regulators, statutory boards or authorities or law enforcement agencies to comply with any laws, rules, guidelines and regulations or schemes imposed by any governmental authority; and
- any other party whom you authorize us to disclose your Personal Data to.

We do this where required by law; where it is necessary to administer the working relationship with you; or where we have another legitimate interest in doing so.

We require third parties to respect the security of your data and to treat it in accordance with the law.

Special Category and Sensitive Personal Information

We will use your particularly sensitive personal information in the following ways:

- We will use information relating to leaves of absence, which may include sickness absence or family related leaves, to comply with employment and other laws.
- We will use information about your physical or mental health, or disability status, to ensure your health and safety in the workplace and to assess your fitness to work, to provide appropriate workplace adjustments, to monitor and manage sickness absence and to administer benefits.
- We may use information about your race or national or ethnic origin, religious, philosophical, or moral beliefs, or your sexual life or sexual orientation, to ensure meaningful equal opportunity monitoring and reporting.

A. Health, Race, Religion, Sexual Orientation, Trade Union Membership

“Special categories” of particularly sensitive personal information require higher levels of protection. We may process special categories of personal information in the following circumstances:

- In limited circumstances, with your explicit written consent.
- Where we need to carry out our legal obligations.
- Where it is needed in the public interest, such as for equal opportunities monitoring, in relation to our pension scheme, and in line with our Data Protection Policy.
- Where it is needed to assess your working capacity on health grounds, subject to appropriate confidentiality safeguards.

Less commonly, we may process this type of information where it is needed in relation to legal claims or where it is needed to protect your interests (or someone else’s interests) and you are not capable of giving your consent, or where you have already made the information public. We may also process such information about employees or former employees in the course of legitimate business activities with the appropriate safeguards.

B. Criminal Convictions and Credit Report Information

We may only use information relating to criminal convictions and credit history where the law allows us to do so. This will usually be where such processing is necessary to carry out our obligations and provided we do so in line with our Data Protection Policy.

Less commonly, we may use information relating to criminal convictions where it is necessary in relation to legal claims, where it is necessary to protect your interests (or someone else’s interests) and you are not capable of giving your consent, or where you have already made the information public.

We may also process such information about employees or former employees during legitimate business activities with the appropriate safeguards.

We do envisage that we may hold information about criminal convictions. We will only collect information about criminal convictions if it is appropriate given the nature of the role and where we are legally able to do so. Where appropriate, we will collect information about criminal convictions as part of the recruitment process or we may be notified of such information directly by you in the course of you working for us or should your role change during the course of your employment and your new roles requires us to hold such information.

We are allowed to use your personal information in this way to comply with our legal obligations and as necessary for the purposes of legitimate business activities.

5. Failure To Provide Information

If you fail to provide certain information when requested, we may not be able to perform the contract we have entered into with you (such as paying you or providing employee benefits), or we may be prevented from complying with our legal obligations (such as to ensure the health and safety of our workers).

6. Data Retention

We will store your personal information in accordance with the retention periods applicable to the Wirex entity you are employed with in accordance with the Wirex Global Data Protection Policy.

7. Overseas Data Transfer

We may transfer the personal information we collect about you outside of the jurisdiction of the Wirex entity you are employed under (your “applicable jurisdiction”) in order to perform our contract with you. All personal data is provided with adequate protection and that all transfers of personal data outside your applicable jurisdiction are done lawfully. Where international transfers are performed between Wirex group entities, such transfers will be covered by EU Standard Contractual Clauses (for transfers from within the Union to a third country) with the ICO's Addendum (for transfers from within the UK to a third country.) which are mentioned in the MASTER INTRAGROUP SERVICES AND LICENCE AGREEMENT as of July 23,2023.

Where the personal data of employees is sent to an external third party external which is based outside the EU, the transfer mechanism used to protect the data will be dependent on the contract between Wirex and said third party.

8. Protection of Personal Data

Wirex will use reasonable endeavours to maintain appropriate physical, electronic, and organisational procedures to ensure that your personal data and other data is treated securely and in accordance with this Privacy Notice, and to protect such data against unauthorized access or unauthorized alteration, disclosure, or destruction of data.

Once we have received your information, we will use strict procedures and security features to try to prevent unauthorized access, alteration, disclosure, or destruction of your personal data.

Wirex does not give any representation, warranty or undertaking that the personal data you provide to us will be secure at all times, and to the extent Wirex has fulfilled its obligations under no circumstances shall Wirex be responsible for any losses, damages, costs and expenses which you may suffer or incur arising from unauthorised access to or use of your personal data.

9. Your Rights

Right of access

You have a right to access the personal data we hold on you. This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it

Rectification

You have a right to rectify, amend or update any incorrect, incomplete, or outdated personal data of yours which we have on record. to update incomplete personal data

Restriction

You have a right to request us to restrict the processing of your personal data if you believe that:

- any of the information that we hold about you is inaccurate;
- we no longer need to process your information for the purposes for which it was provided, but you require the information to establish, exercise or defend legal claims; or
- we are not using your information in a lawful manner.

Please note that if you request us to restrict the processing of your information, it may interfere with our obligations to you as an employer or our performance of your engagement agreement.

Deletion

You have a right to ask us to delete or remove personal information where there is no good reason for us to continue to process it. You also have the right to ask us to delete or remove your personal information where you have exercised your right to restrict or object to processing.

Objection & Withdrawal of Consent

You have a right to object or withdraw your consent to the use, processing or sharing of your personal data.

However, Wirex may continue to process your data under circumstances where we can demonstrate compelling and legitimate grounds for the processing, which may override your own interests, or where we need to process your information to investigate and protect us or others from legal claims. Depending on the circumstances, we may agree to restrict or cease processing your personal data altogether or, where requested, delete your information.

Please note that if you withdraw consent or object to us using, sharing, or processing your information, we may be unable to continue fulfilling our obligations under the employment/engagement agreement which are contingent on the processing or use of that data.

Portability

You have the right to request us to provide your personal data directly to a third party, if technically feasible. However, do note that once the data is ported to that party, Wirex is not responsible for any such third party's use of your personal information, which will be governed by their agreement with you and any privacy statement they provide to you.

You have the right to lodge a complaint to Wirex by sending it to legal@wirexapp.com or to The Information Commissioner Office ICO <https://ico.org.uk/make-a-complaint/>.

10. Updates to this Notice

We reserve the right to update this privacy notice at any time, and we will provide you with a new privacy notice when we make any substantial updates. We may also notify you in other ways from time to time about the processing of your personal information.

If you have any questions about this privacy notice, please contact the People & Culture Team by emailing legal@wirexapp.com.