



PRIVACY NOTICE

INTERNAL

February 2023

Bringing Ingenuity to Life.
paconsulting.com

PA'S SIX CORE VALUES

Our success as an innovation and transformation consultancy is founded on a set of core values that drive the way we behave with clients and each other.

Inspired by client value:

We are committed to creating visible and sustained value for our clients. We are proud of our clients and what they think of us; we build long lasting relationships with our clients, responding to and anticipating their needs.

Passionate about people:

We are proud to be part of a team of brilliant people – our firm's most prized asset. We are passionate about supporting each other in our continued growth to fulfil our ambitions.

Achieving success through shared endeavours:

We work collaboratively in diverse teams, shoulder-to-shoulder with our clients. We achieve more together than we could alone.

Prizing our ethical approach:

We are independent and prize our integrity and honesty. We strive to do 'the right thing' rather than 'the easy thing' which guides us through the responsibility of day-to-day activities, and through our most difficult challenges.

Seeking to excel:

We seek to excel in everything we do. We aspire to continually enhance our learning; we are ambitious to grow our innovation and insight.

Creating commercial success:

We are proud of what we are worth to our clients. We take personal responsibility for our commercial success, sharing and reinvesting our rewards.

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Document control information

Pre-Approval Version	Date	Author	Description of Changes
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1.2	13/04/22	InfoSec Analyst - MTH	Updated country list and punctuation
1.3	20/05/22	InfoSec Analyst - MTH	Update the document number to a DP one
1.4	26/05/22	Legal Counsel - BM	Removal of GDPR from title, updated document purpose, updated data sharing and data transferring, plus additional changes throughout
1.5	15/07/22	InfoSec Analyst - MTH	Updated country list to include ROI
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1.7	17/02/23	Snr Legal Counsel	Amended to include GDPR and data privacy notices for diversity data

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1 What is the purpose of this document?

PA is committed to protecting the privacy and security of your personal information. This privacy notice describes how we collect and use personal information about you and your diversity data which is a special category of personal data, before, during and after your working relationship with us, in accordance with applicable data protection law and in particular the General Data Protection Regulation (GDPR).

2 Privacy notice for employees, workers and contractors

This privacy notice applies to all employees, workers and contractors engaged by the PA Group of companies. PA is a "controller". This means that we are responsible for deciding how we hold and use personal information about you. We are required under data protection legislation to notify you of the information contained in this privacy notice. This notice applies to current and former employees, workers, and contractors. This notice does not form part of any contract of employment or other contract to provide services.

This notice is published in the PA GOM (Global Operating Manuals) section of PA's intranet and should be read alongside PA's Approach to Data Protection which is also published in the PA GOM. We may update this notice at any time. Any major updates will be notified to you electronically. It is important that you read and retain this notice, together with any other privacy notice we may provide on specific occasions when we are collecting or processing personal information about you, so that you are aware of how and why we are using such information and what your rights are under the data protection legislation.

2.1 Data protection principles

We will comply with applicable data protection and privacy laws in all countries where we operate. Where required by law, we will ensure that the personal information we hold about you is:

1. Collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes
2. Relevant to the purposes we have told you about and limited only to those purposes
3. Accurate and kept up to date
4. Kept only as long as is necessary for the purposes we have told you about
5. Kept securely

2.2 The kind of information we hold about you

Personal data, or personal information, means any information about an individual which enables that person to be identified. It does not include data where the identity has been removed (anonymous data).

There are certain types of more sensitive personal data which require a higher level of protection, such as information about a person's health criminal convictions or diversity data.

We will collect, store, and use the following categories of personal information about you:

- Personal contact details such as name, title, addresses, telephone numbers, and personal email addresses
- Date of birth
- Next of kin and emergency contact information
- Government social security numbers. In the UK this will include your National Insurance Number
- Bank account details, payroll records and tax status information
- Salary, annual leave, pension, and benefits information
- Start date and, if different, the date your continuous employment began
- Leaving date and your reason for leaving
- Location of employment or workplace
- Copy of identity documents provided at the start of, or during the course of, your employment
- Recruitment information (including copies of right to work documentation, references and other information included in a CV or cover letter or as part of the application process)

- Employment records (including job titles, work history, working hours, holidays, training records and professional memberships)
- Compensation history
- Performance information
- Disciplinary and grievance information
- CCTV (Closed Circuit Television) footage and other information obtained through electronic means such as swipe card records. This is processed and stored in accordance with [PA's Approach to IT](#)
- Information about your use of our information and communications systems – for further information please see [PA's Approach to IT](#)
- Photographs and videos of you
- Languages spoken
- Courses attended
- We may also collect, store, and use the following more sensitive types of personal information, such as information about your race or ethnicity, religious beliefs, sexual orientation, and political opinions
- Information about your health, including any medical condition, health, and sickness records, including:
 - where you leave (or are absent from) employment (or leave any share plan operated by a group company) due to ill-health, injury or disability, the records relating to that decision
 - details of any absences (other than holidays) from work including time on statutory parental leave and sick leave and
 - where you leave employment and the reason for leaving is related to your health, medical information may be needed for dealing with pensions and insurances
- Information about criminal convictions and offences.

2.3 How is your personal information collected?

Our employment checks align with regional baseline security checks such as the United Kingdom Government Baseline Personnel Security Standard. We collect personal information about employees, workers and contactors through the application and recruitment process, either directly from candidates or sometimes from previous employers, academic institutions, employment agencies or background check providers (such as credit reference agencies). Where individuals have travelled or are required to travel, we may need police certificates for any countries where the individual has lived. For some roles, we may collect additional information from Government, if Security Clearance is required.

We may also collect personal information from the trustees or managers of pension arrangements operated by a group company.

We will collect additional personal information in the course of job-related activities throughout the period of you working for us.

2.4 How will we use information about you?

We will only use your personal information when the law allows us to. Most commonly, we will use your personal information in the following circumstances:

- Where we need to perform the employment contract, we have with you
- Where we need to comply with a legal obligation
- Where it is necessary for legitimate interests pursued by us or a third party and your interests and fundamental rights do not override those interests

We may also use your personal information in the following situations, which are likely to be rare:

- Where we need to protect your interests (or someone else's interests)
- Where it is needed in the public interest

2.5 Situations in which we will use your personal information

We need all the categories of information in the list above primarily to allow us to perform our contract with you and to enable us to comply with legal obligations. In some cases, we may use your personal information to pursue legitimate interests, provided your interests and fundamental rights do not override those interests. The situations in which we will process your personal information are listed below.

- Making a decision about your recruitment or appointment
- Determining the terms on which you work for us
- Checking you are legally entitled to work in the relevant jurisdiction
- Paying you and, if you are an employee or deemed employee for tax purposes, deducting tax and other social security contributions
- Providing the flexible benefits to you as you request
- Inviting you to participate in any share plans operated by a group company
- Granting awards under any share plans operated by a group company
- Administering your participation in any share plans operated by a group company, including communicating with you about your participation and collecting any tax and social security due on any share awards
- Selling goods and services to clients where you are personally involved in the sale or delivery of the same to clients
- Marketing PA's goods and services generally in the marketplace
- Enrolling you in a pension arrangement in accordance with our statutory automatic enrolment duties or where you opt in to such schemes
- Liaising with the trustees or managers of a pension arrangement operated by a group company, your pension provider, and any other provider of employee benefits
- Administering the contract, we have entered into with you
- Business management and planning, including accounting and auditing
- Conducting performance reviews, managing performance, and determining performance requirements
- Making decisions about salary reviews, promotions and compensation
- Assessing qualifications for a particular job or task, including decisions about promotions
- Gathering evidence for possible grievance or disciplinary hearings
- Making decisions about your continued employment or engagement
- Making arrangements for the termination of our working relationship
- Education, training, and development requirements
- Dealing with legal disputes involving you, or other employees, workers, and contractors, including accidents at work or dealing with regulatory bodies
- Ascertaining your fitness to work
- Managing sickness absence
- Complying with health and safety obligations
- To prevent fraud or other breaches of laws
- To monitor your use of our information and communication systems to ensure compliance with our IT policies

- 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
- Some of the above grounds for processing will overlap and there may be several grounds which justify our use of your personal information
- If you are involved in the consulting side of our business, we will use some of your personal data in our proposals and marketing materials, where clients have an expectation that the team's details are provided
- Other general marketing information where we will give you the opportunity to take part.

2.6 If you fail to provide personal 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 a benefit), or we may be prevented from complying with our legal obligations (such as to ensure the health and safety of our workers).

2.7 Change of purpose

We will only use your personal information for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If we need to use your personal information for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Note that we may process your personal information without your knowledge or consent, in compliance with the above rules, where this is legally required.

2.8 How we use sensitive personal information

"*Special categories*" of sensitive personal information, such as information about your health, racial or ethnic origin, sexual orientation, or trade union membership, require higher levels of protection. We need to have further justification for collecting, storing, and using this type of personal information. We have in place an appropriate policy document and safeguards which we are required by law to maintain when processing such data attached as the Appendix to this document. 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 or exercise rights in connection with employment
- Where it is needed in the public interest, such as for equal opportunities monitoring or in relation to our occupational pension scheme

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.

2.9 Situations in which we will use your sensitive personal information

In general, we will not process sensitive personal information about you unless it is necessary for performing or exercising obligations or rights in connection with employment. On rare occasions, there may be other reasons for processing, such as it is in the public interest to do so. The situations in which we will process your sensitive personal information are listed below. We have indicated the purpose or purposes for which we are processing or will process your more sensitive personal information.

- 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 including parental pay, statutory sick pay, pensions, and health insurance. We need to process this information to exercise rights and perform obligations in connection with your employment
- If you leave employment and, under any share plan operated by a group company, the reason for leaving is determined to be ill-health, injury, or disability, we will use information about your physical or mental health, or disability status in reaching a decision about your entitlements under the share plan
- If you apply for an ill-health pension under a pension arrangement operated by a group company, we will use information about your physical or mental health in reaching a decision about your entitlement
- We will use information you give us voluntarily 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.

2.10 Do we need your consent?

We do not need your consent if we use special categories of your personal information in accordance with our written policy to carry out our legal obligations or exercise specific rights in the field of employment law. In limited circumstances, we may approach you for your written consent to allow us to process certain particularly sensitive data (such as Section 3, where we might seek your consent to the collection and processing of diversity data). If we do so, we will provide you with full details of the information that we would like and the reason we need it, so that you can carefully consider whether you wish to consent. You should be aware that it is not a condition of your contract with us that you agree to any request for consent from us.

Some jurisdictions require your consent before we use photographs or videos of you in PA's sales and marketing materials. We will always comply with such local laws and obtain your express consent where this is legally required. More generally, you will have the opportunity to upload photographs for PA's use in marketing materials. Where PA has arranged photo or video shoots for more general photos and videos, you will be notified of these and given the opportunity to attend or not attend as you choose.

2.11 Information about criminal convictions

We may only use information relating to criminal convictions 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 this privacy notice.

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.

We are allowed to use your personal information in this way to carry out our obligations under certain client contracts (such as Government contracts) or in order to comply with baseline checks required by our ISO27001 accreditation. We have in place an appropriate policy and safeguards which we are required by law to maintain when processing such data.

2.12 Data sharing with third parties

We may have to share your personal information with third parties, including third-party service providers and other entities in the group.

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

If we do transfer your personal information to third parties, you can expect us to ensure similar degree of protection for your personal data.

2.13 Why might you share my personal information with third parties?

We will share your personal information with third parties 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.

2.14 Which third-party service providers process my personal information?

"Third parties" includes third-party service providers (including contractors and designated agents) and other entities within our group. The following activities are carried out by third-party service providers: payroll, pension administration, expenses administration, travel services, benefits providers, share trustee services, IT hosting services and system provision.

We will share personal data, regarding your participation in any pension arrangement operated by a group company, with the trustees or scheme managers of the arrangement in connection with the administration of the arrangements.

2.15 How secure is my information with third-party service providers and other entities in our group?

All our third-party service providers and other entities in the group are required to take appropriate security measures to protect your personal information in line with our policies. We do not allow our third-party service providers to use your personal data for their own purposes. We only permit them to process your personal data for specified purposes and in accordance with our instructions.

2.16 When might you share my personal information with other entities in the group?

We will share your personal information with other entities in our group as part of our regular reporting activities on company performance, in the context of a business reorganisation or group restructuring exercise and for system maintenance support and hosting of data. We will share personal data relating to your participation in any share plans and pension arrangements operated by a group company with other entities in the group for the purposes of administering the share plans.

2.17 What about other third parties?

We may share your personal information with other third parties, for example in the context of the possible sale or restructuring of the business. In this situation we will, as far as possible, share anonymised data with the other parties before the transaction completes. Once the transaction is completed, we will share your personal data with the other parties if and to the extent required under the terms of the transaction.

We may also need to share your personal information with a regulator or to otherwise comply with the law. This may include making returns to Tax Authorities, and disclosures to shareholders such as directors' remuneration reporting requirements.

2.18 Transferring personal information to other countries

We will transfer the personal information we collect about you to the following countries in order to perform our contract with you:

Countries within the European Union (EU)

United States

United Kingdom (UK)

Abu Dhabi and Dubai

New Zealand (NZ)

Qatar

Republic of Ireland

With the exception of the EU, UK and NZ, these countries are not deemed to provide an adequate level of protection for your personal information. However, to ensure that your personal information does receive an adequate level of protection, we have put in place legal agreements to ensure that your personal information is treated by those third parties in a way that is consistent with, and which respects the applicable laws on data protection (for e.g., EU and UK GDPR). If you require further information about these protective measures, you can request it from privacy@paconsulting.com.

3 GDPR privacy notice for diversity data

This privacy notice applies to all employees based within the European Union. PA is a "data controller" of your diversity data, which is a special category of personal data, as defined by GDPR.

This notice **only** applies to your **diversity data**.

We are required under GDPR to notify you of the information contained in this privacy notice. This notice applies to current and former employees. This notice does not form part of any contract of employment or other contract to provide services.

Any major updates will be notified to you electronically. It is important that you read and retain this notice so that you are aware of how and why we are using your diversity data and what your rights are under GDPR.

3.1 Data protection principles – Diversity data

We will comply with data protection law. This says that the personal information we hold about you must be:

1. Used lawfully, fairly and in a transparent way
2. Collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes
3. Relevant to the purposes we have told you about and limited only to those purposes
4. Accurate and kept up to date
5. Kept only as long as is necessary for the purposes we have told you about
6. Kept securely

3.2 The kind of diversity information we will ask for

Personal data, or personal information, means any information about an individual which enables that person to be identified. It does not include data where the identity has been removed (anonymous data).

In addition to the general collection of personal data already specified in this notice, we will collect and store the following diversity data which you provide to us through the PA online HR system. The diversity data will be used on an anonymous and aggregated basis as described below.

- Gender and Gender Identity
- Ethnicity
- Sexual Orientation
- Disability (Health)
- Marital Status
- Religion or Belief
- Veteran Status
- Social Mobility
- Caring Status.

Not all this diversity data will be collected in all regions.

3.3 How is your diversity information collected?

We will provide you with the ability to voluntarily provide your diversity data to us through our online HR system. You can update, amend or remove the data at any time.

3.4 How we will use diversity information about you?

The raw data you provide will be securely stored and only be accessible to a very small number of personnel. We will aggregate your data with other employees and remove any data that identifies you. We will use this aggregated, anonymised diversity data in the following circumstances:

- complying with legislation or other legal obligations where we do business relating to equality
- to analyse the diversity of our employees for internal review and the purposes of evaluating progress
- against our Global Inclusion & Diversity Strategy's aims
- to publicise PA's diversity statistics, including to clients when responding to bids
- to determine any changes we want to make to our business (including changes to policies and procedures) to support a more diverse workforce.

3.5 If you fail to provide diversity information

There is no requirement for you to provide diversity data and you will not be penalised in any way if you do not provide it. You only provide the diversity data you wish to supply for us to use for the purposes in this notice.

3.6 Change of purpose

We will only use your diversity data for the purposes for which we collected it. If we need to use your diversity data for an unrelated purpose, we will notify you and seek your consent (unless we have another legitimate basis for doing so in law).

3.7 Data sharing with third parties and within PA

We will only share aggregated, anonymised diversity data with third parties. We will only share anonymised diversity data with other entities in our group as part of our regular reporting activities on company performance.

We may also share diversity data in the context of a business reorganisation or for system maintenance support and hosting of data. We will do so securely and limiting the individuals who may see such data as to identify you. We will ensure that those employees will understand the additional responsibilities they have in accessing your diversity data.

4 Data security

We have put in place measures to protect the security of your information. Details of these measures are available upon request.

Third parties will only process your personal information on our instructions and where they have agreed to treat the information confidentially and to keep it secure.

We have put in place appropriate security measures to prevent your personal information from being accidentally lost, used, or accessed in an unauthorised way, altered, or disclosed. In addition, we limit access to your personal information to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal information on our instructions, and they are subject to a duty of confidentiality. Details of these measures may be obtained from the privacy@paconsulting.com.

We have put in place procedures to deal with any suspected data security breach and will notify you, and any applicable regulator, of a suspected breach where we are legally required to do so.

5 Data retention

5.1 How long will you use my information for?

We will only retain your personal information for as long as is necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements. Details of retention periods for distinct aspects of your personal information are available in our retention policy which is available from [the Data Retention GOM](#). To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

In some circumstances we may anonymise your personal information so that it can no longer be associated with you, in which case we may use such information without further notice to you. Once you are no longer an employee, worker, or contractor of the company we will retain and securely destroy your personal information in accordance with the Data Retention GOM.

6 Rights of access, correction, erasure and restrictions

6.1 Your duty to inform us of changes

It is important that the personal information we hold about you is accurate and current. Please keep us informed if your personal information changes during your working relationship with us.

6.2 Your rights in connection with your personal information

Under certain circumstances, where required by applicable law, you have the right to:

- **Request access** to your personal information (commonly known as a "data subject access request"). This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it.
- **Request correction** of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.
- **Request erasure** of your personal information. This enables you to ask us to delete or remove personal information where there is no good reason for us continuing 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 object to processing (see below).
- **Object to processing** of your personal information where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground. You also have the right to object where we are processing your personal information for direct marketing purposes.
- **Request the restriction of processing** of your personal information. This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it.
- **Request the transfer** of your personal information to another party.
- If you want to review, verify, correct, or request erasure of your personal information, object to the processing of your personal data, or request that we transfer a copy of your personal information to another party, please contact the Data Protection Compliance Manager (privacy@paconsulting.com) in writing.

6.3 No fee usually required

You will not have to pay a fee to access your personal information (or to exercise any of the other rights). However, we may charge a reasonable fee if your request for access is clearly unfounded or excessive. Alternatively, we may refuse to comply with the request in such circumstances.

6.4 What we may need from you

We may need to request specific information from you to help us confirm your identity and ensure your right to access the information (or to exercise any of your other rights). This is another appropriate security measure to ensure that personal information is not disclosed to any person who has no right to receive it.

6.5 Right to withdraw consent

In the limited circumstances where you may have provided your consent to the collection, processing, and transfer of your personal information for a specific purpose, you have the right to withdraw your consent for that specific processing at any time. To withdraw your consent, please contact the privacy@paconsulting.com. Once we have received notification that you have withdrawn your consent, we

will no longer process your information for the purpose or purposes you originally agreed to, unless we have another legitimate basis for doing so in law.

6.6 Data protection compliance manager

We have established a Data Protection Compliance Manager to oversee compliance with this privacy notice. If you have any questions about this privacy notice or how we handle your personal information, please contact the Data Protection Compliance Manager at privacy@paconsulting.com. You have the right to make a complaint at any time to the Information Commissioner's Office (ICO) in the UK, or your local supervisory authority for data protection issues.

6.7 Changes to this privacy 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 PRIVACY@PACONSULTING.COM.

A Appendix

PA's Appropriate Policy Document

1. About this policy

- 1.1 This is the "appropriate policy document" for the PA Consulting Group of companies ("PA") setting out how we will protect Special Categories of Personal Data. It is to enable PA to conduct research into the diversity of its employees and implement such changes as PA feels appropriate to PA's policies to support its wish to have a diverse employee base.
- 1.2 This policy supports PA's other policies relating to data protection and privacy and supplements those policies.
- 1.3 This document meets the requirement of the Data Protection Act 2018 that an appropriate policy document be in place where Processing Special Categories of Personal Data in certain circumstances.

2. Definitions

Controller: the person or organisation that determines when, why and how to Process Personal Data.

Data Retention Policy: explains how the organisation classifies and manages the retention and disposal of its information. Time periods for retention are set out in PA's Approach to Data Retention global operating manual (GOM).

Data Subject: a living, identified or identifiable individual about whom we hold Personal Data. Data Subjects may be nationals or residents of any country and may have legal rights regarding their Personal Data.

Data Privacy Impact Assessment (DPIA): tools and assessments used to identify and reduce risks of a data processing activity. A DPIA can be carried out as part of Privacy by Design and should be conducted for all major system or business change programmes involving the Processing of Personal Data.

DPA 2018: the Data Protection Act 2018.

GDPR: the General Data Protection Regulation ((EU) 2016/679).

Personal Data: any information identifying a Data Subject or information relating to a Data Subject that we can identify (directly or indirectly) from that data alone or in combination with other identifiers we possess or can reasonably possess. Personal Data includes Special Categories of Personal Data.

Privacy Notice: the notice setting out information that may be provided to Data Subjects when the organisation collects information about them.

Processing or Process: any activity that involves the use of Personal Data. It includes obtaining, recording or holding the data, or carrying out any operation or set of operations on the data including organising, amending, retrieving, using, disclosing, erasing or destroying it. Processing also includes transmitting or transferring Personal Data to third parties.

Special Categories of Personal Data: information revealing racial or ethnic origin, political opinions, religious or similar beliefs, trade union membership, physical or mental health conditions, sexual life, sexual orientation, biometric or genetic data.

3. Why we process Special Categories of Personal Data

- 3.1 For the purposes of this specific Appropriate Policy Document, we collect and store Special Categories of Personal Data and use the aggregated, anonymised data for the following purposes:
 - (a) complying with legislation or other legal obligations where we do business relating to equality;

- (b) to analyse the diversity of our employees for internal review and the purposes of evaluating progress against our Global Inclusion & Diversity Strategy's aims;
- (c) to publicise PA's diversity statistics, including to clients when responding to bids;
- (d) to determine any changes we want to make to our business (including changes to policies and procedures) to support a more diverse workforce.

4. Personal data protection principles

- 4.1 The GDPR requires personal data to be processed in accordance with the six principles set out in Article 5(1). Article 5(2) requires controllers to be able to demonstrate compliance with Article 5(1).
- 4.2 We comply with the principles relating to Processing of Personal Data set out in the GDPR which require Personal Data to be:
 - a) Processed lawfully, fairly and in a transparent manner (Lawfulness, Fairness and Transparency);
 - b) collected only for specified, explicit and legitimate purposes (Purpose Limitation);
 - c) adequate, relevant and limited to what is necessary in relation to the purposes for which it is Processed (Data Minimisation);
 - d) accurate and where necessary kept up to date (Accuracy);
 - e) not kept in a form which permits identification of Data Subjects for longer than is necessary for the purposes for which the data is Processed (Storage Limitation); and
 - f) Processed in a manner that ensures its security using appropriate technical and organisational measures to protect against unauthorised or unlawful Processing and against accidental loss, destruction or damage (Security, Integrity and Confidentiality).
- 4.3 We are responsible for and must be able to demonstrate compliance with the data protection principles listed above (Accountability).

5. Compliance with data protection principles

5.1 Lawfulness, fairness and transparency

Personal Data must be processed lawfully, fairly and in a transparent manner in relation to the Data Subject.

We will only Process Personal Data fairly and lawfully and for specified purposes. The GDPR restricts our actions regarding Personal Data to specified lawful purposes. We can Process Special Categories of Personal Data only if we have a legal ground for Processing and one of the specific Processing conditions relating to Special Categories of Personal Data applies. We will identify and document the legal ground and specific Processing condition relied on for each Processing activity.

We will collect Special Categories of Personal Data from Data Subjects directly from Data Subjects. We will provide Data Subjects with a Privacy Notice setting out all the information required by the GDPR in a privacy notice which is concise, transparent, intelligible, easily accessible and in clear plain language which can be easily understood.

Lawful Processing basis	Processing condition for Special Categories of Personal Data
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Equal opportunity data

Data concerning or revealing the Data Subject's

- Gender and Gender Identity,
- Ethnicity,
- Sexual Orientation,
- Disability (health),
- Marital Status,
- Religion or Belief,
- Veteran Status,

- Social Mobility,
- Caring Status.

The lawful basis: **Consent (Article 6.1(a) GDPR); Explicit Consent (Article 9(2)(a) GDPR)**

5.2 Do we need consent?

We rely on the written consent of Data Subjects to allow us to process the Personal Data (including special category data) listed in 5.1 for the equal opportunity purposes listed in paragraph 3. When we seek consent, we will provide Data Subjects with full details of the information that we would like and the reason we need it, so that Data Subjects can carefully consider whether they wish to consent. Data Subjects will be made aware that it is not a condition of employment that they agree to any request for consent from us. Consent may be withdrawn at any time.

This policy relates only to our collection, storage and use of Personal Data for the equal opportunities purposes listed in paragraph 3. We may collect, store and use some of the Personal Data categories listed in paragraph 5.1 for other purposes without your consent, where there is a lawful basis for us to do so (such as compliance with employment obligations) in accordance with PA's GOMs relating to the processing of Personal Data and PA's general privacy policy.

5.3 Purpose limitation

Personal Data must be collected only for specified, explicit and legitimate purposes. They must not be further Processed in any manner incompatible with those purposes.

We will only collect personal data for specified purposes and will inform Data Subjects what those purposes are in a published Privacy Notice. We will not use Personal Data for new, different or incompatible purposes from those disclosed when it was first obtained unless we have informed the Data Subject of the new purposes and they have consented (where necessary).

5.4 Data minimisation

Personal Data shall be adequate, relevant and limited to what is necessary in relation to the purposes for which it is processed.

We will only collect or disclose the minimum Personal Data required for the purpose for which the data is collected or disclosed. We will ensure that we do not collect excessive data and that the Personal Data collected is adequate and relevant for the intended purposes.

5.5 Accuracy

Personal Data must be accurate and, where necessary, kept up to date. It must be corrected or deleted without delay when inaccurate.

We will ensure that the Personal Data we hold and use is accurate, complete, kept up to date and relevant to the purpose for which it is collected by us. We check the accuracy of any Personal Data at the point of collection and at regular intervals afterwards. We take all reasonable steps to destroy or amend inaccurate or out-of-date Personal Data.

5.6 Storage limitation

We only keep Personal Data in an identifiable form for as long as is necessary for the purposes for which it was collected, or where we have a legal obligation to do so. Once we no longer need Personal Data it shall be deleted or rendered permanently anonymous.

We maintain a Data Retention Policy and related procedures to ensure Personal Data is deleted after a reasonable time has elapsed for the purposes for which it was being held, unless we are legally required to retain that data for longer.

We will ensure Data Subjects are informed of the period for which data is stored and how that period is determined in any applicable Privacy Notice.

5.7 Security, integrity, confidentiality

Personal Data shall be Processed in a manner that ensures appropriate security of the Personal Data, including protection against unauthorised or unlawful Processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures.

We will implement and maintain reasonable and appropriate security measures against unlawful or unauthorised Processing of Personal Data and against the accidental loss of or damage to Personal Data.

5.8 Accountability principle

We are responsible for, and able to demonstrate compliance with these principles. Any questions about this policy should be submitted to privacy@paconsulting.com.

We will:

- a) Ensure that records are kept of all Personal Data Processing activities, and that these are provided to the Information Commissioner on request.
- b) Carry out a DPIA for any high-risk Personal Data Processing to understand how Processing may affect Data Subjects and consult the Information Commissioner if appropriate.
- c) Have internal processes to ensure that Personal Data is only collected, used or handled in a way that is compliant with data protection law.

6. Controller's policies on retention and erasure of personal data

We take the security of Special Categories of Personal Data very seriously. We have administrative, physical and technical safeguards in place to protect Personal Data against unlawful or unauthorised Processing, or accidental loss or damage. We will ensure, where Special Categories of Personal Data are Processed that:

- a) The Processing is recorded, and the record sets out, where possible, a suitable time period for the safe and permanent erasure of the different categories of data in accordance with our Data Retention Policy.
- b) Where we no longer require Special Categories of Personal Data for the purpose for which it was collected, we will delete it or render it permanently anonymous as soon as possible.
- c) Where records are destroyed we will ensure that they are safely and permanently disposed of.

Data Subjects receive a Privacy Notice setting out how their Personal Data will be handled when we first obtain their Personal Data, and this will include the period for which the Personal Data will be stored, or if that is not possible, the criteria used to determine that period. The Privacy Notice is also available on the intranet page where the Special Categories of Personal Data is collected.

7. Review

- 7.1 This policy on Processing Special Categories of Personal Data is reviewed annually.
- 7.2 The policy will be retained where we process Special Categories of Personal Data and for a period of at least six months after we stop carrying out such processing.
- 7.3 A copy of this policy will be provided to the Information Commissioner on request and free of charge.



About PA.

We believe in the power of ingenuity to build a positive human future.

As strategies, technologies, and innovation collide, we create opportunity from complexity.

Our diverse teams of experts combine innovative thinking and breakthrough technologies to progress further, faster. Our clients adapt and transform, and together we achieve enduring results.

We are over 4,000 strategists, innovators, designers, consultants, digital experts, scientists, engineers, and technologists. And we have deep expertise in consumer and manufacturing, defence and security, energy and utilities, financial services, government and public services, health and life sciences, and transport.

Our teams operate globally from offices across the UK, Ireland, US, Nordics, and Netherlands.

PA. Bringing Ingenuity to Life.

Discover more at paconsulting.com and connect with PA on [LinkedIn](#) and [Twitter](#).

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