

YOUR VOICE COLLEAGUE ENGAGEMENT SURVEY

PRIVACY NOTICE

This notice sets out how we use your personal data when you complete Primark's Colleague Engagement Survey.

Your personal data

Primark's colleagues are our greatest asset and you should be confident that everything possible is being done to create an environment that allows them to thrive in the workplace, understand that they are valued and be able to share their opinions.

The Colleague Engagement Survey provides a unique opportunity to gain insights and feedback from our colleagues.

The survey is voluntary and confidential. We are interested in learning more about colleagues' views and experiences, but the survey has been designed to ensure survey responses will never be used in a way that identifies anyone. Colleague data (Employee ID, first name, last name, work email, line manager, hire date, separation date, separation reason, date of birth, gender, country, store or office location, cost centre, employee type, leave type, job level, job profile, management level, active status and preferred language) will be extracted from Primark's existing data sources and shared with Peakon, an external survey provider, for the purposes of setting up and launching the survey, and in order to receive the survey results.

Results data from the survey will be aggregated and provided to managers and leadership in Primark via a secure online results dashboard in the Peakon platform. Only those who meet the criteria for a dashboard will be provided access and there are global data and visibility settings within the Peakon platform to ensure confidentiality is maintained. If data falls under the visibility threshold, these results will not be displayed. Peakon will treat survey responses as confidential and will provide Primark with these dashboards but will not share any identifiable personal information with Primark.

Aggregated results and/or comments may also be extracted and stored in Primark databases and/or filesystems to allow further analysis e.g. to provide insight to leadership on common themes and trends in comments and scores.

Peakon makes every effort to ensure that it never includes any information that could be used to identify you from your survey responses, even if the dataset is small. **To minimise the risk of identifying any individual, please do not provide any information in comment boxes which could identify you or another individual.**

Even though Primark will not use your survey responses in a way that identifies you, any information you do provide will be protected by applicable data protection law.

Legal basis

Primark shares your personal data with Peakon on the basis of our legitimate interest in setting up and launching the survey, and receiving the survey results. Participation in the survey is voluntary. If you complete the survey, we will ask you questions that relate to your experience working in Primark and your thoughts/opinions on the Primark workplace. These questions are all optional. We will collect and use your survey responses on the basis that this is necessary for Primark's legitimate interests in:

- Developing a People & Culture strategy that is informed by feedback from our colleague base;
- Understanding how colleagues feel about working at Primark, both good and bad, and help Primark do more of what colleagues like and make smart choices about how to improve the things colleagues don't like;
- Creating action plans at all levels of the organisation to improve colleague engagement and satisfaction;
- Creating initiatives to improve our colleague retention levels;
- Providing better experiences for our customers: happy colleagues contribute to happier customers;
- Utilizing the Peakon platform so that Primark can track colleague engagement scores over time to determine if the actions taken are having a positive effect.

Retention of your data

Primark colleague data shared with Peakon to set up and launch the survey, and to receive results

Peakon will retain personal data provided by Primark in order to set up and launch the survey, and to provide Primark results, for the duration of the term of the colleague's contract in order to facilitate the launch of future surveys. After this time period, or if Primark are no longer contracted with Peakon, this data will be deleted.

If a colleague leaves Primark, this personal data will be deleted by Peakon 90 days after the colleague's separation date from Primark. This allows an appropriate timeframe for an error in colleague status or separation date to be corrected; it also ensures that colleagues who re-join Primark within 90 days can be re-activated instead of being uploaded as a brand-new colleague which creates a duplicate record.

Survey responses

Peakon will reflect your most recent survey responses on the Peakon survey results dashboards for a period of six months. After six months and/or if you respond to a subsequent survey, your previous survey scores will be aggregated on the trend line within the dashboards. Peakon looks back over six months' worth of survey scores to bring the most recent score an employee has supplied into the current score calculation.

Once the above six month period expires, survey scores are still retained, however they now form part of the aggregated trend line with the dashboards. Peakon retains all survey scores aggregated on the dashboard trend line for a period of five years. Survey comments are also retained for a period of five years. After five years, all survey scores and comments are deleted. This five-year period enables Primark to track changes in engagement levels over time and determine progress against actions taken in response. This includes the retention of, and ability to analyse any comments left by colleagues during this time period. Reducing this retention period would limit Primark's ability to track colleague engagement if responses were to drop off the system in a shorter timeframe.

If a colleague leaves Primark, their survey responses are retained and displayed on dashboards as described above. Although the colleague has left Primark, the reasons why they have left are still relevant and may not have been addressed, so it's important to still have that context. If a colleague wishes for all of their survey responses to be deleted, they can do this by sending a request to privacy@workday.com.

Sharing of your data

As above, your data will be shared securely with third party data processor, Peakon, a Software as a Service product that collects and analyses colleague engagement data through surveying of colleagues on Primark's behalf. To provide some of the functions available in results dashboards, Peakon may engage the services of third-party providers (sub-processors) with the same level of data security requirements as the Peakon platform.

Transfer outside EEA

All personal data will be hosted by Peakon in the EEA.

Your Rights

Data protection law gives you rights to ask us to rectify, block, complete and delete your personal data, and to restrict its use. You also have the right to request a copy of your personal data. You also have the right to object to the processing of your data by us in some circumstances.

There are exceptions to these rights, however. For example, it will not be possible for us to comply with a relevant request if we have insufficient information to identify the survey response that relates to you.

If you wish to access your personal data or exercise any of your rights, you should contact your P&C Manager or the Primark Data Protection Coordinator (email to dataprotection@primark.ie).

You also have the right to make a complaint to your data protection supervisory authority if you believe that your rights have been breached.