

Coronavirus Privacy Notice

This supplementary privacy notice is to make it easier to understand and provide you with more information about how the IPL group of companies (“**the Group**”) may seek to collect and hold information about you in relation to the unprecedented challenges we are all facing during the coronavirus pandemic.

At this time, we may seek to collect and process your personal data in response to the pandemic, which is above and beyond what would ordinarily be collected in order to ensure your safety and well-being.

Such information will be limited to what is proportionate and necessary, taking into account the latest guidance issued by the Government and health professionals, in order to manage and contain the virus.

It will enable the Group to ensure our businesses safeguard our employees, workers and contractors and fulfil their important roles in food production and supply.

Who is processing your data?

All personal data held is processed in accordance with data protection law. The Data Controller for the information outlined in this privacy notice is the group company that you work for, or, if you are a visitor are visiting, whether it is International Procurement & Logistics Limited, Forza Foods Limited or Kober Limited. The addresses of these companies is detailed on our main privacy notice, which still applies.

What personal data is being collected?

In order to best respond to the coronavirus, it is necessary for the Group to collect some additional information about your health, including whether you have any symptoms of the virus, details of your travel to foreign countries and other relevant information. It will also be necessary for the Group to contact you where we believe that you have been in close contact with another individual who has tested positive for the virus while at work. We process this information on the basis of our legitimate interests to maintain a safe and secure workplace for colleagues and visitors, enabling the Group to ensure we fulfil our important roles in food production and supply.

Health information is Sensitive Personal Information (“**SPI**”). This type of information is considered to be particularly sensitive under the law so we take our responsibilities for protecting it, keeping it confidential and using it correctly very seriously. We are allowed to process SPI in this context in the interests of public health to help prevent the spread of the coronavirus, or where we are required to use it to meet our legal obligations in connection with employment.

How we will use the information?

The situations in which we will use your information and the type of data involved are set out below.

Purpose	Examples of data involved
For all visitors entering our sites:	
Assessing fitness to enter our premises pursuant to our	<ul style="list-style-type: none"> Information relating to virus symptoms, notifications of possible exposure by an NHS contact tracing service, contact with anyone who is displaying

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Ag4	V4	Privacy and legitimate interest notice (Coronavirus)	12 October 2021	V3 23 August 2021	Andrew Gillen	Varinder Rehal

obligation to ensure a safe and secure working environment	<p>symptoms, tests and test results for yourself, your household and support bubble</p> <ul style="list-style-type: none"> Information relating to travel to / from / through foreign countries
For all employees and other workers:	
To make colleagues and workers aware if they have been in close contact with another individual at Forza/Kober/IPL who has tested positive for coronavirus	<ul style="list-style-type: none"> Contact telephone number and email address
To manage colleagues that have a higher risk of coronavirus complications	<ul style="list-style-type: none"> Health and medical information relating to the 'clinically extremely vulnerable' or 'clinically vulnerable' classifications, including medical conditions and diagnosis which may affect risk in connection with the virus We may ask you to confirm or show us confirmation of test results or vaccine status – but we will not make a copy of these
Determining the appropriate return to work arrangements following holidays	<ul style="list-style-type: none"> Information relating to virus symptoms, notifications of possible exposure by an NHS contact tracing service, contact with anyone who is displaying symptoms, tests and test results for yourself, your household and support bubble Information relating to travel to / from / through foreign countries or territories We may ask you to confirm or show us confirmation of test results or vaccine status – but we will not make a copy of these
Determining the appropriate return to work arrangements following self-isolation or sickness	<ul style="list-style-type: none"> Information relating to virus symptoms, notifications of possible exposure by an NHS contact tracing service, contact with anyone who is displaying symptoms, tests and test results for yourself, your household and support bubble We may ask you to confirm or show us confirmation of test results or vaccine status – but we will not make a copy of these
To manage colleague attendance and timekeeping, administer pay (and statutory sick pay) and compatible purposes	<ul style="list-style-type: none"> Information relating to virus symptoms, your physical or mental health, or disability status, notifications of possible exposure by an NHS contact tracing service, contact with anyone who is displaying symptoms, tests and test results for yourself, your household and support bubble We may ask you to confirm or show us confirmation of exposure or test results – but we will not make a copy of these

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 it for an unrelated purpose, we will explain the legal basis, which allows us to do so.

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Who we will share your information with?

We have controls to limit access to your personal information to:

- Individual colleagues who need it to do their job, such as your leadership team or HR Team;
- Authorised third parties who provide services on behalf of The Group, such as our Occupational Health providers, who need it to provide services to us or you.

If requested, and where it is required or permitted by law, we may provide personal information to:

- Official bodies, such as government agencies, local authorities, regulators and the police, who are authorised to request information where it is necessary for their lawful purposes;
- Where required, advisors for The Group including lawyers, insurers, accountants and auditors;
- Other organisations such as law firms or insurance companies acting on behalf of individuals, who may request evidence containing personal information, to support a claim.

How do we protect your personal information?

We limit access to your personal information to those employees who need to know it. 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. We have procedures to deal with any suspected data security breach and will notify you and any applicable regulator where legally required.

How long do we keep this information for?

Colleague data will be deleted or anonymised no later than 1 calendar month after the relevant return to work from holiday, self-isolation or illness.

In the following specific situations, we will need to retain the data for longer:

- We will retain data relevant for managing colleagues at higher risk of coronavirus complications for as long as the pandemic is a risk to them or the timescales set out in our data retention schedule, whichever is earlier
- We will retain the data for managing colleague attendance and timekeeping, and administering pay (and statutory sick pay), in line with the timescales set out in our data retention schedule

Visitor and contractor data will be retained for 1 calendar month after the relevant attendance at our premises.

Where is your personal data kept, processed and accessed from?

Personal information for these activities is processed by the group companies within the European Economic Area (the "EEA"), although some information may be processed in other global locations depending on the computer systems utilized. To ensure that personal information is handled in line with our high standards, including providing the same level of protection, we put in place transfer arrangements with each company that processes personal information outside the EEA. If you want to know more about these data transfer arrangements, get in touch with IPL's Compliance Team by emailing compliance@ipl-ltd.com

Your rights

As with our existing privacy notice which is still applicable, if you have any questions or are not happy about the way your personal data is being processed, you can contact IPL's Compliance Team by email: compliance@ipl-ltd.com.

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We have appointed a Data Protection Officer to provide independent expert advice and monitor compliance with data protection laws. You can contact our Data Protection Officer in the following ways.

By Email: dataprotection@asda.co.uk

By Post: Data Protection Officer
Compliance Team
Asda House
Great Wilson Street
Leeds, LS11 5AD

You also have the right to complain to the Information Commissioner's Office. Advice and guidance from the ICO on this issue can be found on the [ICO website](https://ico.org.uk/) - <https://ico.org.uk/>

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