



Contractor Privacy Notice – US

Wilmington plc (the “**Company**”) collects and processes personal data relating to its contractor to manage the working relationship. The Company is committed to being transparent about how it collects and uses that data and to meeting its data protection obligations.

This privacy notice describes how the Company collects and uses personal information about you during and after your working relationship with it. This notice applies to all current and former contractors (including any consultants). This notice does not form part of any contract. The Company may update this notice at any time. All notices and policies are available on request.

The Company has a dedicated Data Protection Officer, who is responsible for data compliance issues. If you have any questions about this policy, please contact them. Their contact details are below:

Bethan Cater
+44 (0)207 324 2346 (Ext: 1346)
Bethan.Cater@wilmingtonplc.com

What Information Does the Company Collect?

The Company collects and processes a range of information about you. This may include:

- engagement information (including, references and other information included in a CV or cover letter or as part of the engagement process);
- your name, address and contact details, including email address and telephone number
- the terms and conditions of your work with us;
- details of your qualifications, skills and experience history, where relevant;
- information about your charging structure;
- details of your bank account and any identifiers
- details of your working schedule;
- information about medical or health conditions, including whether or not you have a disability for which the Company needs to make reasonable adjustments;
- CCTV footage and other information obtained through electronic means such as key card or swipe card records; and
- Photographs (whether for our records, the intranet or for public facing profiles).

Information is collected in a variety of ways. For example, data is collected through engagement processes, CVs or resumes; from correspondence with you; or through interviews or other meetings.

In some cases, the Company collects personal data about you from third parties, such as information from background check providers, information from credit reference agencies and information from basic criminal records checks as required by client contract.

Data is stored in a range of different places, including in the Company's HR management systems and in email and finance systems.

Last Reviewed: 09/05/25

It is important that the personal information the Company holds about you is current and accurate. If your personal information changes during your working relationship with the Company, please contact us at external.engagement@wilmingtonplc.com.

Monitoring

The Company carries out monitoring only as necessary for the purposes of its legitimate interests in relation to legal disputes, grievance and disciplinary hearings, ensuring compliance with the Company's IT policies, security, and fraud prevention. Where provision of the services requires the contractor to be given access to our IT systems, such access and use may be monitored in line with our compliance requirements. In the event of such use, contractors can refer to the Company's IT Acceptable Use Policy and the IT Security Policy for further information, which are available on request.

Why Does the Company Process Personal Data?

The Company needs to process data to enter into a contract with you and to meet its obligations under your contract. For example, it needs to process your data to provide you with a contract, to pay you in accordance with your contract.

In other cases, the Company has a legitimate interest in processing personal data before, during and after the end of the relationship. Processing data allows the Company to:

- maintain accurate and up-to-date records and contact details and records of contractual and statutory rights;
- ensure that it complies with duties in relation to individuals with disabilities, meet its obligations under health and safety law, and ensure that contractors are receiving the pay to which they are entitled;
- ensure effective general business administration;
- respond to and defend against legal claims; and
- maintain and promote equality in the workplace.

Where the Company relies on legitimate interests as a reason for processing data, it has considered whether or not those interests are overridden by the rights and freedoms of contractors and has concluded that they are not.

Who Has Access to Data?

Your information will be shared internally with members of the HR team, finance, your point of contact, other individuals in the business area in which you work, the External Engagements team and IT staff if access to the data is necessary for performance of their roles.

The Company shares your data with third parties in order to obtain references and/ or background checks from third-party providers. The Company may also share your data with third parties in the context of a sale of some or all of its business. In those circumstances the data will be subject to confidentiality

arrangements.

The Company also shares your data with third parties that process data on its behalf, in connection with contractor payroll.

Where Does the Company Store Data?

The Company stores data in third party provided Self Service platform hosted in the cloud in the UK and other HR and payroll systems used in the relevant territory.

Your data may be accessed by yourself or the Company in the territories that we operate in: Europe, America and Asia. If your data is accessed and processed by the Company outside of the UK, it makes sure that is done lawfully with a similar degree of protection being afforded in respect of your personal data.

How Does the Company Protect Data?

The Company takes the security of your data seriously. The Company has internal policies and controls in place to try to ensure that your data is not lost, accidentally destroyed, misused or disclosed, and is not accessed except by its employees in the performance of their duties. HR systems have restricted access and are password protected. For further information, refer to the IT Security Policy (available on request). Where the Company engages third parties to process personal data on its behalf, they do so on the basis of written instructions, are under a duty of confidentiality and are obliged to implement appropriate technical and organisational measures to ensure the security of data.

For How Long Does the Company Keep Data?

Retention periods for your data are detailed below. At the end of the retention period personal data will be reviewed and deleted unless there is a particular reason for keeping it.

All information and payroll records are retained for a period of 6 years, plus the current tax year.

When your personal information is deleted, we take the following actions:

- All electronic data in systems will have data retention processes automated for deletion; and
- All data will have a documented and verified deletion process.

If you have any questions regarding the management and processing of your data, please contact Bethan.Cater@wilmingtonplc.com.