

## Hilton Foods Privacy Statement

Hilton Foods and its subsidiary companies respect personal privacy and will process any personal information only for the purpose it is intended. We will never sell your personal information to third parties and will work hard to ensure compliance with all privacy law including the General Data Protection Regulations (GDPR). We only collect, use, disclose or otherwise process your Personal Information where it is fair and lawful to do so.

This Privacy Statement explains how we use your personal data when dealing with Hilton Foods or its subsidiaries. We have provided specific information for visitors to this website and to job seekers or employees. We also explain what happens to your personal data when you contact us.

We may update this Privacy Policy from time to time. If we do change it, we will post the revised version on the website and change the “last updated” date.

Please take time to read this Privacy Policy carefully and get in touch with us if you have any questions or concerns.

### **Privacy Management and How to Contact Us**

The Data Controller for Hilton Food Group can be contacted by email at: [data.controller@hiltonfoodgroup.com](mailto:data.controller@hiltonfoodgroup.com). Or by post: for the attention of The Data Controller, c/o The Company Secretary, Hilton Food Group plc, 2-8 The Interchange, Latham Road, Huntingdon, Cambridgeshire, PE29 6YE.

### **Complaints or queries**

If you want to make a complaint about the way we have processed your personal information, you can contact the Data Controller who is obliged to record and to respond to your complaint. You also have the right to complain to the Information Commissioner (ICO). You can find details of how to do this at: <https://ico.org.uk/make-a-complaint/>

### **Safeguarding your personal information**

We use appropriate physical, technical and administrative security measures to protect your personal information from loss, misuse, unauthorised access, or modification.

### **Links to other websites**

This privacy notice does not cover the links within this site linking to other websites. We encourage you to read the privacy statements on the other websites you visit.

We may also use third parties to provide apps, tools, widgets and plug-ins for our online services, which may collect information about how you use these features. These organizations have their own privacy policies and we would again encourage you to visit their websites and view the privacy policies.

### **Visitors to our websites**

When someone visits <https://www.hiltonfoods.com/> we use a third-party service, Google Analytics, to collect standard internet log information and details of visitor activity patterns. We do this to find out things such as the number of visitors to the various parts of the site. This information is only processed in a way that does not identify anyone.

We do not make, and do not allow Google to make, any attempt to find out the identities of those visiting our website. If we do want to collect personally identifiable information through our website, we will let you know about this. We will make it clear when we collect personal information and will explain what we intend to do with it.

### **Use of cookies**

You can read more about how we use cookies on our [cookies page](#).

You also have the option to set your own cookies settings from the menu at the bottom of our website.

### **Search engine**

Search queries and results are logged anonymously to help us improve our website and search functionality. No user-specific data is collected by either Hilton Foods or any third party.

### **Security and performance**

We use a third-party service to help maintain the security and performance of our website. To deliver this service it processes the IP addresses of visitors to the Hilton Foods website but does so passively by not recording any personal information.

### **People who call us by phone**

When you contact us by phone, we collect digital caller information. We use this information to help improve the efficiency and effectiveness of our systems and do so passively. We may note the substance of conversations and contact details where actions arising from the telephone contact are required, you will be notified if this is the case.

### **People who email us**

We encrypt and protect email traffic. If your email service does not support encryption, you should be aware that any emails we send or receive might not be protected in transit.

We will also monitor any emails sent to us, including file attachments, for viruses or malicious software. Please be aware that you have a responsibility to ensure that any email you send is legal. Internet routing may result in data being moved outside of your local legislative jurisdiction.

### **People who visit our sites**

Visitors to Hilton sites will need to identify themselves and we will hold their name and company contact for the period of time required by local policy.

### **Job applicants and employees**

Hilton Foods is the data controller for the information you provide during the recruitment and employment process unless otherwise stated. If you have any

questions relating to the process or any privacy or data security issues then please raise these with your local HR or recruitment contact.

What will we do with the information you provide to us?

The information you provide during the recruitment process will only be used for the purpose of progressing your application, contacting you with regards to your application or to fulfil legal or regulatory requirements if necessary.

Employee information & what we do with it

We will not share any of the information you provide during the recruitment process with any third parties or store it outside of your local legislative jurisdiction. The information you provide will be held securely by us.

We do not collect more information than we need to fulfil our stated purposes and will not retain it for longer than is necessary, in accordance with our data retention periods.

Employee personal data will be removed from the processing environment in accordance with our data retention periods. This includes training information and payroll and attendance data.

Recruitment Agencies

For some vacancies, we may advertise through a recruitment agency or executive search organisation. We will require them to manage your data in accordance with the GDPR, or the relevant local data protection and privacy legislation. We will remove your information in line with the local data retention policy.

Submitting your CV

When you upload your CV to the Hilton Foods website, we ask for the following information: first and last name, phone number, email address, work history or experience and personal qualifications. This information will only be used for the purpose of progressing your application and we will not collect more information than we need to process your application. We will not retain it for longer than is necessary, in line with the local data retention periods.

Payroll

Where we outsource payroll we will provide the payroll company with the details required for them to process your pay and to send you tax summaries. Where there is a provider involved, they will be the data processor. They are required to adhere to Hilton Food's data protection policies. Please refer to the local People and Culture contact for details of your payroll service.

Hilton Food's Employee Share Schemes

The administrators of the company's share schemes act as processors of personal information to manage your membership of the scheme. The administrators are contractually bound by Hilton Foods as a processor. For UK and Europe the Equiniti Privacy Statement is available [here](#). For APAC the Link privacy statement is available [here](#).

**Data Retention**

We will not hold your personal information for longer than is necessary. The length of the retention period will be in accordance with the local data retention policy, which will be dependent on the following circumstances:

- The end of the relationship that we have with you
- The completion of the purpose for which the personal data was given
- Our legal obligations in relation to that personal data
- The type of data

## **Investors**

Hilton Food Group does not directly process any personal data from investors and uses Equiniti as registrar. Equiniti's privacy statement is found [here](#).

## **Your Rights**

Hilton Foods applies the principles underlying data protection law in all its subsidiary companies and complies with all relevant legislation relating to privacy and the retention of personal information. This section applies to all people whose personal data is held by Hilton.

- You have the right to ensure that the personal data you have provided to us is treated correctly, for the purpose it has been given and according to the law – in particular the law commonly described as the General Data Protection Regulations – GDPR.
- You have the right to know what information we hold about you and to request access to or a copy of all the personal data we hold that refers to you. This includes the right to access data within a month of a request being made. You have the right to be given that data in a form that is 'portable'. This means that we will supply you it in common format such as .pdf, word, .txt or other commonly used formats to ensure its portability – so that you can take it with you and use it elsewhere. The format and context can be discussed with the Data Controller should you make a request for data access.
- You have the right to have any data that is incorrectly recorded or inaccurate rectified promptly.
- You have the right to withdraw consent at any time. Where you have provided your consent to us to use or hold your personal data and where the legal basis of processing information is by specific consent then you have the right to withdraw consent at any time. Within Hilton Foods, virtually all data processing will be carried out in relation to the operation of a contract of employment or supply and Hilton Foods will not normally use consent as the legal basis for processing data. If you wish to withdraw consent, then you can do this with your data controller.
- You have the right to restrict the content of the personal data that we process and this can be discussed with the controller and arrange for it to be removed if it is not needed.
- You have the right to have your data erased where we do not have an overriding legal obligation or reason to retain it. Commonly described as the 'right to be forgotten' you can request that your personal data is erased. In practice, this means that we will, upon request, cease to process personal data. We will offer

you the opportunity to discuss how this will be done when you request your data be erased. In some circumstances, data will still be held – for example if there is a legal obligation requiring continuing data storage – such as with Tax authorities. All other processing will stop and full erasure will follow the expiry of the overriding legal obligation.

- You have the right to object to the use of your data, i.e. opting out of receiving marketing communications, such as a newsletter
- You have the right to request that we pass data you have provided to us about yourself to another organisation on your behalf.
- We may ask you to provide confirmation of your identity and in most cases requests will be responded to within one month.

### **Overseas Processing**

Personal information will not be transferred outside of the local legislative area other than subject to the strict controls required by compliance with national data privacy and security law.

### **Site Monitoring Statement**

We have CCTV cameras installed for security, safety and access control. It is therefore only in public areas, and not in the changing room or toilets, or anywhere else expected to be private. Access to this footage is restricted to authorised persons and will only be accessed in the event of a suspected breach of the above. Please refer to local CCTV policies for more details.

We have time recording, which identifies individuals for the purposes of ensuring that people are properly paid, to flag absence issues and to facilitate complete evacuation in the event of a fire. Please refer to the local People and Culture department for more information.

The Group has common IT security policies and server profiles that actively monitor the IT environment to ensure its security and proper use. Activity can be traced back to individuals by way of event logs, email records and telephone logs. Logs are kept securely and have very limited access by staff. Records and logs are destroyed in line with data retention policy.

The IT Policies explain what users can and cannot do with IT and communications equipment and should you have any questions then please refer these to the local IT contact.

Hilton will use computer files and other records to investigate any suspected illegal activity or unacceptable behaviour in line with our policies and procedures with the approval and overview of senior management. Monitoring activity has legal implications in terms of privacy, data security and personal rights. The purpose of monitoring is for safety and for compliance with Company Policy.

### **Whistleblowing**

If you make a disclosure as a whistle-blower then your information, and the information that you provide us with will be handled in accordance with our [Whistleblowing Policy](#).

All reported concerns will be treated confidentially. We will respect, so far as we are able, any request for anonymity and where this is not possible we will make efforts to inform you.

There are certain circumstances where it may be necessary for us to share the information you have provided with others. For example, to look into the concerns you have raised, for safeguarding reasons or to prevent a serious crime.

**Last Reviewed: December 2023**