**PRIVACY NOTICE FOR THE ONEIDA GROUP EU EMPLOYEES AND JOB APPLICANTS:**

This Privacy Notice concerns the employee personal data we collect and process in connection with employment. As a resident of a member state of the European Union, you are entitled to receive the information in this Privacy Notice.

* **Your Data and What We Do with It**. The Oneida Group Inc. (“we”, “us”, “our”) has collected your personal data related to your application for employment and/or your employment with the Company including
* Personal contact details such as name, title, address, telephone number and personal email addresses
* Date of birth
* Gender
* Equal opportunities monitoring information
* **Recruitment information (including copes of right to work documentation, references and other information in your CV or cover letter or otherwise provided as part of the application process)**.

We use it to:

* process your application for employment
* To make decisions about your recruitment and appointment
* To determine the terms on which you work/provide services for us
* To check you are legally entitled to work in the UK

Under data protection legislation we are only permitted to use your personal data if we have a legal basis for doing so as set out in the data protection legislation. We rely on the following legal bases to use your information for employment/engagement related purposes:

* Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
* Where we need information to perform the contract we have entered into with you

**What happens if you do not provide information that we request?**

We need some of your personal data in order to perform our contract with you. For example, we need some information so that we can comply with our legal obligations. For example, we need information about your health and fitness to work to comply with our health and safety obligations.

Where information is needed for these purposes if you do not provide it we will not be able to perform our contract with you and may not be able to offer employment/engagement or continue with your employment/engagement. We explain when this is the case at the point where we collect information from you.

**International Data Transfer.** We may transfer your personal data to third parties such as our payroll processor, benefits providers and our 401K advisor in order to provide those services to you. We transfer your data to our servers located in the United States, or to servers operated by our service providers which are also located in the United States.

**Data Sharing. We may share your data with our partners noted above for employee payroll and benefits purposes who serve as our data processor(s).**

**Data Retention.** We will keep your personal data for 8 years after you are no longer employed by us**.**

**Your Rights.** You have the following rights, which you may exercise by providing notice to our Data Protection Manager at dataprivacyoffice@theoneidagroup.com:

* to withdraw your consent
* to file a complaint with a supervisory authority
* to request access to and rectification or erasure of your personal data
* to object to our processing of your data

**Contact Us.** You may contact us with any questions, concerns, or requests to exercise your rights under applicable law as described above, by contacting:

The Oneida Group Inc.

200 S. Civic Center Dr

Suite 700

Attn: Data Privacy Office

Email: dataprivacyoffice@theoneidagroup.com