

# Serious Concerns Reporting (Whistleblowing) Data Privacy Notice

## 1. Introduction

We respect the privacy rights of individuals and are committed to handling personal information responsibly and in accordance with applicable law. **It is important that you read all of this Notice carefully as it sets out how the Wood group of companies ("Wood", "we", "us" or "our") handles your personal information and the privacy rights you have in connection with that information in relation to disclosures made under Wood whistleblowing policies and procedures including EthicsPoint.** If you are in any doubt regarding the applicable standards, or have any comments or questions about this Notice, please contact us using the contact details set out at [Section 11](#) below.

## 2. Scope

This Notice provides information about how Wood uses data it collects about you when you raise a concern through its business ethics helpline, EthicsPoint. Further information about how Wood uses personal data and your rights in connection with that use can be found in the Wood Worker Privacy Notice [here](#) for workers and the Wood Contacts Privacy Notice [here](#) for individuals who are not workers. The term **"worker"** includes those who work on a non-permanent basis, including contingent workers, temporary and contract workers, independent contractors, consultants, professional advisors, secondees and interns.

## 3. Types of personal information we collect and process

Wood will collect personal data from you as far as is necessary to properly conduct its review or investigation of concerns reported on EthicsPoint.

The types of personal information we may process include, but are not limited to:

- identification data – such as your full name;
- contact details – such as home and business address, telephone/email addresses;
- employment details – such as job title/position, office location, business unit, employment contract, employer, employer address;
- incident details – details of actual or alleged incidents/violations/breaches of law, policies and procedures.
- sensitive personal information (including **"Special Category Data"** as defined in the GDPR) – such any information that reveals your racial or ethnic origin, religious, political, or philosophical beliefs, genetic data, biometric data for the purposes of unique identification, trade union membership, or information about your health/sex life (**"Sensitive Personal Information"**).

## 4. Purposes for processing personal information

### *Serious Concerns Reporting Disclosure and Investigation Purpose*

We collect and process your personal information for the purpose of investigating actual or alleged violations of applicable laws, breaches of Wood's policies and procedures, and managing our employment or working relationship with you.

Your report will be input and stored on Wood's case management system, which is known as EthicsPoint and provided by NAVEX Global Inc. The system provides a channel for employees and third parties to raise a concern about violations of Wood's Code of Conduct or potential violations of other policies, regulations or laws. Wood has carried out due diligence to ensure that NAVEX Global Inc. applies industry Wood and standards to protect the personal information submitted to



EthicsPoint, both when transmitted and when stored including security measures and firewalls on its network servers. For further information on how NAVEX Global Inc. process your personal data, please see their privacy statement [here](#).

During an investigation we may also process your personal information using other IT systems. This may involve transferring your personal information internationally to our servers or those of our third-party providers, such as IBM who provide Wood with infrastructure support, but in either case, we will be responsible for ensuring that your personal information is adequately protected and confidentiality is maintained.

#### *Law-related purposes*

We also may use your personal information where we consider it necessary for complying with laws and regulations, including collecting and disclosing worker personal information as required by law (e.g. for tax, health and safety, anti-discrimination laws), under judicial authorization, or to exercise or defend Wood's legal rights.

If you do not provide us with the personal information requested, we may not be able to accomplish the purposes outlined in this notice.

## **5. Who we share your personal information with**

We take care to allow access to personal information only to those who require such access to perform their tasks and duties and to third parties who have a legitimate purpose for accessing it. The data captured within the EthicsPoint is only directly available to those with authorised access including certain members of the Ethics and Compliance and People & Organisation ("P&O") teams and indirectly by others who are involved with investigations including company leadership, Legal, Finance, Internal Audit, Security, and Health & Safety Security Environment and Assurance.

Whenever we permit a third party to access personal information, we will implement appropriate measures to ensure the information is used in a manner consistent with this Notice and that the security and confidentiality of the information is maintained.

#### *Transfers to other Wood companies*

We will share your personal information with other Wood companies on a "need to know" basis in order to investigate and report on the information you provided.

#### *Transfers to other third parties*

We may also disclose personal information to third parties on other lawful grounds, including:

- to comply with our legal obligations, including where necessary to abide by law, regulation or contract, or to respond to a court order, administrative or judicial process, including, but not limited to, a subpoena, government audit or search warrant;
- to receive professional services from our professional advisors (including but not limited to legal, investigative specialists, auditors or other advisors);
- in response to lawful requests by other individuals (e.g. other workers raising a data subject access request) we would carry out the balancing test required by law and weigh up your rights and the rights of the other person before deciding whether to do this;
- for the purposes of investigating any actual or suspected criminal activity or other regulatory or legal matters (including but not limited to sharing with our regulators, law enforcement or fraud prevention agencies, as well as the, courts, the police and any other authorised bodies);
- in response to lawful requests by public authorities (including for national security or law enforcement purposes);
- as necessary to establish, exercise or defend against potential, threatened or actual litigation;



- where necessary to protect the vital interests of another person;
- in connection with the prospective or actual sale, assignment or other transfer of our business or assets (including to professional advisors and prospective or actual seller(s) or buyer(s)); and
- with your consent.

## 6. Legal basis for processing personal information

If you are a worker in the European Economic Area (“EEA”), Brazil, South Africa or Thailand our legal basis for collecting and using the personal information described above is:

- The processing is necessary for Wood’s performance of its employment obligations towards you;
- The processing is necessary for compliance with a legal obligation to which Wood is subject, for example in the United Kingdom this could be the Public Interests Disclosure Act 1998, the UK Bribery Act 2010 or the Protected Disclosures Act 2000 in South Africa;
- The processing is necessary for Wood’s legitimate interests in operating its business lawfully and in compliance with its policies, laws and practices and so it can provide a safe environment for workers to report concerns.

Wood’s legal basis for using the Sensitive Personal Information described above is:

- The processing is necessary for carrying out its specific rights and obligations as an employer;
- The processing is necessary for the establishment, exercise or defence of legal claims or whenever courts or regulatory authorities are acting in their judicial capacity; or
- with your consent.

In some circumstances relating to serious concerns investigations, we may need to collect, or request on a voluntary disclosure basis, some Sensitive Personal Information for legitimate purposes related to performing our obligations in relation to investigations: for example, information about your racial/ethnic origin, gender and disabilities for the purposes of equal opportunities monitoring or to comply with anti-discrimination laws.

If you are a worker outside of the EEA, Brazil, South Africa or Thailand, in your particular jurisdiction similar legal basis may apply. If you have questions about or need further information concerning the legal basis on which we collect and use your personal information, please contact us using the contact details provided at Section 9 and 11 below.

## 7. Transfer of personal information abroad

As we operate in markets around the world, we may need to transfer personal information to countries other than the ones in which the information was originally collected. When we export your personal information to a different country, we will take steps to ensure that such data exports comply with applicable laws. For example, if we transfer personal information from the European Economic Area to a country outside it, such as the United States, we will implement an appropriate data export solution such as entering into European standard contractual clauses with the data importer and completing appropriate assessments, or taking other measures to provide an adequate level of data protection under European law.

## 8. Data retention periods

Personal information will be kept as long as needed so Wood can carry out its obligations in relation to the information you provided to EthicsPoint and for as long as necessary after that for legal, accounting or reporting requirements.

## 9. Your data privacy rights

You may exercise the rights available to you under applicable data protection laws as follows:

- If you are from the United Kingdom, European Economic Area, South Africa, Brazil, New Zealand and Thailand, if you wish to access, correct, update, or request deletion or object to the use of your personal information, you can do so at any time by contacting us at [woodplc.ethicspoint.com](http://woodplc.ethicspoint.com) or by email at [subjectrights@woodplc.com](mailto:subjectrights@woodplc.com).



- If you are a visitor from outside the region or countries mentioned above, similar rights might apply. If you have questions about or need further information concerning the legal basis on which we collect and use your personal information, please contact us at [woodplc.ethicspoint.com](http://woodplc.ethicspoint.com).

You have the right to complain to a data protection authority about our collection and use of your personal information. For more information, please contact your local data protection authority. Contact details for data protection authorities in the EEA are available [here](#). Contact details for the Brazil Data Protection Authority are available [here](#). Contact details for the South African Data Protection Authority are available [here](#).

We will respond to all requests we receive from individuals wishing to exercise their data protection rights in accordance with applicable data protection laws.

## 10. Updates to this notice

We may update this Notice from time to time in response to changing legal, technical or business developments. When we update our Notice, we will take appropriate measures to inform you, consistent with the significance of the changes we make.

## 11. Contact details

Please address any questions or requests relating to this Notice to your EthicsPoint case contact, Wood's Data Protection Officer or to [privacy@woodplc.com](mailto:privacy@woodplc.com),

Name Lisa Deverick

Position Data Protection Officer

Date June 2021

