

THE PNC FINANCIAL SERVICES GROUP, INC. AND AFFILIATES EU/UK – EMPLOYEE PRIVACY NOTICE

Introduction

This Notice describes the steps that The PNC Financial Services Group, Inc. and affiliates (“**PNC**,” “**Company**,” “**we**” or “**us**”), part of the PNC International Group, takes in order to protect the Personal Data that we Process about our EU/UK Employees. In connections with your employment with us, we collect, store, use and otherwise Process Personal Data about you for various business purposes. We are committed to the protection of the Personal Data that we Process about you in line with the data protection principles set out in the EU General Data Protection Regulation and the UK Data Protection Act 2018 (collectively “GDPR”). This Notice applies to all PNC EU/UK Personal Data, regardless of whether it is maintained in electronic format or in a structured filing system, such as a personnel file intended to form part of a Filing System.

This Notice may be amended from time to time. We will post changes to this Notice on our intranet and any changes will take effect within a reasonable period of time after posting, in keeping with our continuing transparency obligation under GDPR.

Capitalised terms used in this Notice are defined in Section 9 of this Notice.

Identity of the Data Controller

The data controller responsible for Processing your Personal Data is PNC Financial Services UK Ltd, which is registered with company number 07341483 and maintains its registered office at PNC House, 34-36 Perrymount Road, Haywards Heath, RH 16 3DN. You may contact us at this address ensuring all correspondence is marked as for the attention of the Privacy Office. Alternatively, please see Section 8 below for further contact details.

Purposes for Processing Personal Data

PNC Processes Personal Data relating to its Employees for various business purposes that are necessary:

- **for the performance of our employee agreement with you**, including the administration of the employment relationship, including for the purposes of operating payroll and administering employment benefits or maintaining an employee directory;
- **for us to pursue our legitimate interests**, including for the purposes of business process execution and internal management, travel and expense management, business reporting, systems reporting and access, analyses, performance review purposes, training, administering compensation programmes, disciplinary purposes and other business purposes related to the management of PNC’s workforce, for facilities and IT systems and infrastructure management, safeguarding the security of our infrastructure, premises, assets and office equipment, including the prevention of criminal activity, and to report to our regulators, which, due to PNC UK’s ownership and business model, includes (but is not limited to) US regulation by the Federal Reserve Bank; and
- **to meet our legal obligations** as your employer under UK tax, National Insurance and employment laws (health, safety & security).

Categories and Sources of Personal Data that We Process

The categories of Personal Data that PNC Processes for these purposes are set out in **Annex 1**, which also identifies the lawful basis for the Processing, including where the Processing is necessary for the performance of, or entry into, your employment contract or for PNC’s pursuit of its legitimate business interests.

We Process limited amounts of Special Categories of Employee Personal Data in order to comply with our legal obligations, when necessary for the purpose of carrying out our obligations and exercising specific rights in the field of employment and National Insurance laws or pursuant to collective agreements. Processing of Special Categories may also be necessary to protect the vital interests of individuals (e.g., health and safety) or for the establishment, exercise or defence of legal claims. The Special Categories of data that we Process may include data concerning your physical and/or mental health in order to monitor sickness-related absences and to inform decisions regarding your fitness for work.

Most of the Personal Data we Process is from you, other Personal Data may be provided by recruitment agencies, your

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managers, HR benefits providers or others. We may also review social media profiles (generally, professional networks) and consider information that is publically available.

PNC has put in place procedures designed to facilitate Employees' ability to report on suspected fraudulent behavior within the company and other unlawful activities. For details on how to make a report please see the 'Whistleblowing Policy' in the UK Employee Handbook, and the PNC Code of Business Conduct and Ethics. These reports may contain Personal Data about the reporting individual and the behavior of the individuals identified in the report. The reports will be collected by PNC and hosted by PNC Bank, National Association in the United States. Personal Data reported for these purposes will be Processed by PNC in accordance with the GDPR principles and local requirements. Depending on the circumstances and nature of the report, the lawful basis for the Processing of Personal Data for these purposes is either the legitimate interest of your employer or is a legal obligation.

Your Rights

The GDPR provides you with certain rights in relation to the Processing of your Personal Data, including to:

- **Request access to Personal Data about you** (commonly known as a **"data subject access request"**). This enables you to receive a copy of the Personal Data we hold about you.
- **Request rectification, correction, or updating of any of the Personal Data that we hold about you.** This enables you to have any incomplete or inaccurate information we hold about you corrected.
- **Request Personal Data provided by you to be transferred in machine-readable format ("data portability"),** to the extent this right is relevant in the employment context.
- **Request erasure of Personal Data.** This enables you to ask us to delete or remove Personal Data where there is no good reason for us to continue Processing it. You also have the right to ask us to delete or remove Personal Data where you have exercised your right to object to Processing (see below).
- **Request the restriction of Processing of your Personal Data.** This enables you to ask us to suspend the Processing of Personal Data about you (e.g. if you want us to establish its accuracy or the reason for Processing it).
- **Object to the specific types of processing in some circumstances.** This right may apply where Processing of your Personal Data is based on legitimate interests of Company, as

described in Annex 1, or where decisions about you are based solely on automated processing, including profiling.

The exercise of these rights is not absolute and may be subject to certain pre-conditions and exemptions under the GDPR. Should you wish to exercise the rights accorded by the GDPR, please notify us using the contact details in Section 8. Alternatively, it may be more efficient for you to complete the Data Subject Action Request Form, which you will find on the International Employees page of News Online.

You also have the right to file a complaint with the UK Information Commissioner's Office ("ICO") if you are not happy with the way PNC Processes your Personal Data and our response to your request. For more details, please visit the ICO's website: <https://ico.org.uk/concerns/handling/>.

Data Sharing: Intra-Group and Third Parties

A. Intra-group transfers

As a multinational company operating under a matrixed management structure, PNC shares Employee Personal Data with other members of the PNC Financial Services Group, Inc. family of companies for the purposes set out in Section 3 of this Notice. These transfers are protected by the obligations set out in intra-group agreements that have been entered into among and between the various legal entities comprising the PNC Financial Services Group, Inc. family of companies. These agreements cover:

- transfers to PNC Bank, National Association in the United States for storage and Processing and decision making purposes; and
- onward transfer to various third-party vendors (as discussed below).

International transfers within the corporate group are governed by Standard Contractual Clauses for Controllers and for Processors, as approved by the EU Commission and by the UK.

You can obtain a copy of our Data Transfer Agreements by making a request using the contract details set out at Section 8 of this Notice.

B. Third Party Suppliers

PNC shares Personal Data with external vendors that we engage to perform services or functions on our behalf and under our instructions. Where these vendors are located within the EU/UK, their Processing of your data will be subject to GDPR requirements. PNC also will ensure that its contracts with these parties ensure that they only Process Personal Data in accordance with our instructions and in order to provide the

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agreed services and protect the integrity and confidentiality of the Personal Data entrusted to them, in line with GDPR requirements.

For the purposes set out in Section 3 of this Notice, we may also disclose Employee Personal Data to our auditors, lawyers, consultants, law enforcement and other public authorities (such as tax and social security bodies), the police, prosecutors, courts and tribunals. We also may disclose your Employee Personal Data to future or previous employers; credit or employment reference agencies; banks; pension and benefits administrators and insurance companies; hotels, travel agencies, airlines, travel providers. All these recipients are themselves responsible to determine the purposes and means of the Processing and for the lawfulness of the Processing. Where necessary, we will ensure that appropriate contractual measures are in place to ensure the protection of your Personal Data.

Some of the vendors we engage to Process Employee Personal Data are located outside the European Economic Area, in particular the United States. These transfers are governed by Standard Contractual Clauses, as approved by the EU Commission and by the UK, or by Binding Corporate Rules for Processors.

You can obtain a copy of our Data Transfer Agreements by making a request using the contact details set out at Section 8 of this Notice.

Retention of Personal Data

PNC will keep and Process your Personal Data only for as long as necessary for the purposes for which it was collected in connection with your employment with PNC, unless PNC has a legal right or obligation to retain the data for a longer period, or as necessary to establish, exercise or defend related legal claims.

Contact Information

If you wish to exercise your rights under Section 5 of this Notice or have any questions about this Notice, please contact us by writing the physical address in Section 2 above or emailing us at: employeeprivacyuk@pnc.com

Definitions

The following terms used within this Notice are defined as follows:

“Data Controller” means the natural or legal person, public authority, agency or any other body which alone or jointly with others determines the purposes and means of the Processing of Personal Data; where the purposes and means of Processing are determined by national or EU laws or regulations, the

controller or the specific criteria for his nomination may be designated by national or EU/UK law.

“Data Processor” means a natural or legal person, public authority, agency or any other body which processes Personal Data on behalf of the Data Controller.

“Employees” means temporary, full-time and part-time contract employees, interns, contingent workers, retirees, and former employees of PNC.

“Employee Personal Data” means any Personal Data related to Employees, including, as needed, their spouses, partners, and/or dependents.

“European Economic Area” or **“EEA”** means the Member states of the European Union, plus Norway, Iceland and Lichtenstein.

“Filing System” means any structured set of Personal Data which are accessible according to specific criteria, whether centralized, decentralized or dispersed on a functional or geographical basis.

“GDPR” means the EU General Data Protection Regulation 2016/679 including national laws implementing or supplementing the GDPR, including the UK Data Protection Act of 2018 (as amended).

“Personal Data” means any information relating to an identified or identifiable natural person (also referred to as ‘Data Subject’); an identifiable person is one who can be identified, directly or indirectly, in particular by reference to an identifier, such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

“Special Categories of Personal Data” are Personal Data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership; and genetic data, biometric data for the purposes of identifying an individual, data concerning health or data concerning a natural person’s sex life or sexual orientation.

“Process” or **“Processing”** means any operation or set of operations which is performed on Personal Data or on sets of Personal Data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

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ANNEX 1

Categories of Personal Data and Grounds for Processing

Company will Process the following categories of data based on legitimate grounds for Processing:

1. Personal Data necessary for the performance of your employment agreement with Company:

A. Contact Details and Identity Details

- Name
- Work and home contact details (work email, phone numbers, physical address)
- Age
- Gender

B. Compensation Benefits and Payroll

- Banking details
- National Insurance details
- P45/leaver documentation
- Salary details
- Pay grade
- Letter confirming changes to terms and conditions
- PAYE records
- Annual merit and bonus letter
- Salary increase letter
- Private medical insurance documents
- Dental scheme
- Car documentation
- Season ticket loan documentation
- Demotion letter
- Redundancy outcome letter
- Redundancy appeal documentation
- Training certificates
- Disciplinary investigation letter
- Disciplinary investigation witness statements
- Disciplinary manager's notes
- Disciplinary hearing minutes
- Disciplinary outcome/sanction letter
- Disciplinary appeal documentation
- Suspension letter
- Performance reviews/appraisals
- Grievance appeal documentation
- Resignation letter
- Garden leave letter
- Working time opt-out forms
- Jury service leave
- Sabbatical leave documentation
- Maternity/adoption leave – MATB1/Matching certificate
- Paternity leave documents
- Adoption leave documents
- Parental leave documents
- Shared parental leave documents
- Fit notes

- GP records
- PHI documents
- Sickness self-certification form/communications
- Pension benefits
- DC account information
- Contracting out record
- Personal data regarding trustees
- Birth/adoption certificate
- Probation confirmation
- Tuition reimbursement support documents
- Reference letter for mortgage and tenancy
- Reference for travel visa

C. Onboarding Data

- Age/date of birth
- Contact number/email address
- Gender
- Education dates
- Details of referees and references
- CV
- Successful candidate's application form
- Interview notes
- Employment history
- Eligibility to work documentation
- Education documents and certificates
- Background checks including criminal record checks
- New hire start forms
- Non-compete/non-disclosure agreements
- Banking details
- National Insurance details
- Next of kin/emergency contact details
- P45/leaver documentation
- Qualifications

D. Travel and Driving License

- Travel providers
- Car allowance scheme documentation

2. Personal Details Processed where necessary for the purposes of pursuing the legitimate interests of Company in its operations and the security and safety of its property, customers, Employees and third parties.

PNC will collect system and application access data as required to access PNC systems and applications such as:

- Photographs
- CCTV images
- Email communications
- Telephone monitoring
- System ID
- LAN ID
- Mainframe ID

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- Record of website visited
- Work e-mail account
- System passwords
- Entry/exit records (including within the building)
- Emergency contact information
- Electronic content produced by you using PNC systems and PNC-owned devices

3. Personal Details necessary to comply with Company's legal obligations

Some examples of the legal obligations include:

- Income tax and National Insurance deductions
- P45 from previous employer
- P46 (New starter checklist)
- Student Loan information
- Tax code notifications
- Record-keeping and reporting obligations
- Physical access policies
- Jury information
- Maternity/paternity information
- MATB1 certification
- Adoption information
- Conducting audits, compliance with government inspections and other requests from government or other public authorities
- Responding to legal processes, pursuing legal rights and remedies, defending litigation and managing any internal complaints, grievances or claims, conducting investigations, correspondence with ACAS, ruling settlements/COT3 Agreements
- Complying with internal policies and procedures (including but not limited to travelling, driving licence checks, car leasing)

The categories of Personal Data collected include:

- National Insurance number
- Marital status
- Driver's licence
- Health data
- ID card data
- Race/ethnicity
- Nationality/citizenship
- Passport data
- Visa data
- Details of residency or work permit
- Disability status
- Paternity leave documents
- Maternity/adoption leave planner
- Equal opportunities data
- Death certificate details

4. Special Categories of Personal Data Processed in accordance with GDPR Article 9.2(b) or (h)

- A. Data Concerning health
 - Fit notes from GPs
 - Sickness self-certification form/communications
 - Occupational Health assessment forms/reports
 - Occupational Health referral letters/forms
 - Record of return to work discussions

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