GDPR PRIVACY NOTICE:
TUPE TRANSFER

v2.0

September 2026

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Purpose of this notice

This notice explains how Breedon may process your personal data in the event of a legal transfer of a business or undertaking, or part of a business or undertaking, from Breedon to another employer (a **TUPE transfer**). Breedon will comply with legislation relevant to such transfers within the jurisdiction in which the transfer takes place. This notice supplements information already provided to colleagues in the GDPR Privacy Notice: All Breedon Group Workers.

Why we may share your data

In the event of a business sale, merger, outsourcing arrangement, or other relevant event, your employment may transfer to a new employer. To facilitate this process, we may need to share certain personal data with the prospective transferee or their legal advisers.

Types of data that may be shared

We will only share data that is necessary and relevant to the transfer, which may include:

- Your name and contact details.
- Your date of birth.
- Next of kin/emergency contact details.
- Information about any grievance or disciplinary procedures you have been involved in.
- Any previous or prospective claims you have against Breedon.
- Job title and role description.
- Salary and benefits information.
- Employment terms and conditions.
- Absence and performance records.
- Details of statutory payments made (e.g. maternity or paternity payments).
- Special category data (e.g. health or trade union membership).

Legal basis for processing:

We rely on the following lawful bases under the GDPR:

- **Article 6(1)(f)** – Legitimate interests: to enable the smooth transition of employment relationships.
- **Article 9(2)(b)** – Employment law obligations: where special category data is required for compliance with employment law.

Safeguards in place

We will ensure:

- Data minimisation: only necessary data is shared.
- Pseudonymisation or anonymisation is considered where possible.
- Confidentiality agreements are in place with third parties where appropriate.
- Compliance with data protection legislation.

Your rights

You have the right to:

- Be informed about how your data is used.
- Access your personal data.
- Object to processing in certain circumstances.
- Request rectification or erasure of inaccurate data.
- Raise a complaint about the processing of personal information

Contact us

If you have any questions or concerns about this notice or your data rights, please contact our Compliance Team by email at legal.compliance@breedongroup.com