



# Treefera Personnel Privacy Notice

Version: July 2025

This Personnel Privacy Notice (the "**Notice**") describes how, when, and why Treefera Operations Ltd and its affiliates ("**Treefera**", "**we**", "**our**" or "**us**") may collect, store, use, and/or share ("**process**") personal data about you as an employee, contractor, advisor engaged by us or a potential candidate applying to work with us.

We may collect and process your personal data as part of your job application, when you are onboarding with us, during the course of your work or engagement with Treefera, when you use our internal systems, or in connection with our professional obligations as an employer or contracting party.

We may update this Notice from time to time to reflect changes in our operations, legal obligations, or internal processes. The most current version of this Notice will be kept up to date and accessible, and we encourage you to review it periodically to stay informed about how we protect and use your personal data.

If you have any questions about this Notice, or how Treefera processes your personal data, please contact [privacy@treefera.com](mailto:privacy@treefera.com).

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## 1. Our Commitment to Your Privacy

Treefera is committed to respecting and protecting your privacy. We process your personal data lawfully, fairly, and transparently, and only for specified, explicit, and legitimate purposes related to your engagement with Treefera.

We comply with applicable data protection laws, including the UK General Data Protection Regulation (UK GDPR), EU GDPR, and relevant US state and federal privacy regulations.

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## 2. What Personal Data We Collect

We collect and process the following categories of personal data for employment, contracting, and advisory purposes:

Category	Examples of Data
Identification & Contact Data	Full name, home address, personal and work email, phone number, date of birth, nationality, photograph (if provided)
Employment/Contractual Data	Job title, department, manager, employment or contractor agreement, role description, work location, performance reviews, disciplinary records

Financial & Payroll Data	Bank details, tax ID, national insurance number (NI/SSN), salary/remuneration, benefits, pension, expense reimbursements
Compliance & Right-to-Work Data	Passport / national ID, visa, work permits, criminal background checks (if applicable), reference checks, professional licenses
Technical & Security Data	Company device identifiers, user IDs, email communications, system logs, IP addresses when using Treefera systems
Health & Safety Data (if applicable)	Health or medical information for workplace accommodations, sick leave, occupational health reports, COVID-19 records (where required by law)
Emergency Contact Data	Next of kin, emergency contacts
Special Categories of Personal Data	Information related to your racial or ethnic origin, religious, political or philosophical beliefs, trade union membership, veteran status or information about your health, disabilities, or sexual orientation

*Special Categories of Personal Data:* We use this information to ensure we meet relevant laws (e.g. the Equality Act 2010), such as collecting disability information to assess whether appropriate adjustments should be made to your working conditions or during interviews. We may also ask for certain special categories of personal information to help us monitor and improve our diversity and inclusion practices, either during the recruitment process or as part of your employment with us - any such information will only be used in an anonymised form. If you decide not to share such information with us, this does not in any way affect your job application.

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### 3. How and Why We Collect Your Personal Data

We process Personnel data for the following purposes and legal bases:

Purpose	Legal Basis
To administer contracts and manage employment/engagement	Performance of a contract
To pay salary/fees, provide benefits, and manage payroll and tax	Legal obligations; performance of a contract
To ensure right to work and compliance with laws	Legal obligations
To maintain security and access to systems and premises	Legitimate interest; legal obligations
To conduct performance reviews, promotions, and professional development	Legitimate interest; performance of a contract

To manage business operations, including organisational planning	Legitimate interest
To handle grievances, disciplinary actions, and legal claims	Legitimate interest; legal obligations
To ensure health and safety, including workplace accommodations	Legal obligations; explicit consent (where required)
For emergency contact purposes	Legitimate interest
To consider your job application	Legitimate interest
For pre-employment screening	Legitimate interest; legal obligations
To establish, defend or exercise legal claims in an employment tribunal or any other court of law	Legitimate interest; legal obligations

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#### 4. How We Collect Your Data

We may collect personal data:

- Directly from you (e.g., through your CV, cover letter, onboarding forms, contracts, and communications)
  - From third parties (e.g., background check providers, references, recruitment agencies)
  - Automatically through your use of Treefera's systems and devices
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#### 5. How We Share Your Data

Treefera does not sell your personal data. However, we may share your data with:

Recipient	Purpose of Sharing
Payroll providers, benefit administrators	To process and provide salary/fees and benefits
Legal and regulatory authorities	Compliance with law (e.g., tax authorities, immigration)
IT and tech service providers (internal and external)	To manage IT infrastructure, and secure our systems, to manage HR-related processes (e.g. onboarding)
Professional advisors (e.g., lawyers, auditors)	Legal or regulatory compliance; dispute resolution
Recruitment partners	Assistance in recruitment process

Background / Credit check providers

Ensure employee safety and security

Affiliates and group companies

Internal management, HR, and resource planning

#### *International Transfers:*

As Treefera operates across many countries we may need to transfer and use your personal information outside of the country where we collect it from you. Where data is transferred outside the UK/EU (e.g., to the USA), we ensure appropriate safeguards are in place, including Standard Contractual Clauses (SCCs) or other lawful mechanisms.

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## **6. Data Security and Confidentiality**

We implement appropriate technical and organisational security measures to protect Personnel data from unauthorised access, loss, misuse, or disclosure. These measures include:

- Role-based access controls
- Encryption and secure communication
- Secure cloud and data storage providers
- Regular security audits and assessments

All Personnel are required to respect confidentiality and security policies, including safeguarding Treefera systems and information.

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## **7. How Long We Keep Your Data**

We retain your personal data only as long as necessary for employment/contract purposes and to comply with legal obligations (e.g., tax, audit, and employment law).

<b>Data Type</b>	<b>Retention Period</b>
Employment/contract records	Up to 6 years after end of engagement (UK), subject to jurisdiction-specific limits
Payroll/tax data	6–7 years (as required by law)
Health and safety records	40 years (if required for workplace health exposure)
Recruitment data (if unsuccessful)	6 months (may be retained up to 2 years for consideration for future roles, subject to your consent)

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## 8. Your Rights as a Data Subject

Depending on your jurisdiction, you may have the following rights:

- Right of access – to know what data we hold about you
- Right to rectification – to correct inaccurate or incomplete data
- Right to erasure – to request deletion where applicable
- Right to restrict processing – to limit how we use your data
- Right to object – to processing based on legitimate interest
- Right to data portability – to receive a copy of your data
- Right to withdraw consent – where processing is based on consent
- Right to lodge a complaint – with your relevant data protection authority (e.g., ICO in the UK)

Contact for exercising rights:

Email: [privacy@treefera.com](mailto:privacy@treefera.com)

UK ICO Complaint: <https://ico.org.uk/make-a-complaint/>

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## 9. Additional Information for Candidates

If you are a candidate applying to work with us, we may use Ashby, an AI-enabled applicant tracking system service provider, as part of our recruitment process. As Treefera scales, this enables us to be more efficient in reviewing and tracking applications, whilst providing you with a smoother candidate experience.

We nevertheless review all applications by hand. You will not be subject to decisions that will have a significant impact on you based solely on automated decision-making. This is in accordance with Article 22 of the UK and EU GDPR. Any automated tools we use are to support, not replace, human decision-making in our hiring process.

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## 11. Changes to This Notice

Treefera may update this Notice to reflect changes in our practices, legal obligations, or organisational structure. Any updates will be communicated via email or internal announcements and will be posted in an accessible location.


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## 12. Contact Us

If you have any questions, concerns, or requests regarding this Notice or your personal data:

 [privacy@treefera.com](mailto:privacy@treefera.com)

 [info@treefera.com](mailto:info@treefera.com) (general inquiries)

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