



Teladoc Health UK Limited (“THUK”)

Privacy Notice – Staff

Effective Date: 1 October 2024

Introduction

THUK respects your privacy and is committed to maintaining the confidentiality and security of your Personal Information. In furtherance of your employment relationship with THUK, we collect and process your Personal Information in accordance with the principles of 1) Lawfulness, Fairness and Transparency, 2) Purpose Limitation, 3) Data Minimisation, 4) Accuracy, 5) Storage Limitation, 6) Integrity and Confidentiality, 6) Accountability.

Purpose

The purpose of this Notice of Privacy Practices for Employees’ Personal Information (“Notice”) is to provide notification to potential and current full-time and part-time employees, contractors, volunteers, and interns (collectively referred to throughout this Notice as “you”, “your”, “their”, or “Employees”) as to how THUK, Inc. and/or its affiliates and subsidiaries use and disclose your Personal Information.

The purpose of this Notice is also to make you aware of your rights under the applicable data protection laws and regulations, such as the General Data Protection Regulation (EU 2016/679) (“GDPR”), the UK Data Protection Act, the General Law on Data protection (Law 13.709/2018 or “LGPD”), and/or any other applicable local laws and regulations (collectively referred to hereinafter as “Applicable Laws”).

It is important that you read and understand this Notice. If you have questions or do not understand it fully, please seek additional information from the Governance team. or your HR Representative.

This Notice does not create or form part of any contract of employment or other contract to provide services.

Scope

Teladoc Health UK (THUK) entity is a “data controller.” This means that we are responsible for determining how we hold and use Personal Information about you. According to Applicable Laws, we are required to notify you of the information contained in this privacy notice.

This Notice applies to how THUK uses and discloses your Personal Information as part of your employment relationship with THUK. Personal Information is any information that relates to you as a particular individual or, when used in combination with information available publicly or in the possession of THUK, may provide a high probability of identifying you (“Personal Information”). For purposes of this Notice, Personal Information is defined as: any information or set of information relating to you, including (a) all information that identifies you or could reasonably be used to identify you, and (b) all information that any Applicable Law treats as Personal Information, personal data, or similarly protected information, and (c) Special Categories of Personal Information. Special Categories of Personal Information shall mean Personal Information that is afforded extra protection and/or considered “sensitive” under Applicable Law, including, but not limited to: health information, biometric, genetic, sexual tendency, ethnic or racial origin, religious or political beliefs, salary social security number, credit card information as determined by Applicable Laws.

Out of Scope

To the extent that you use any of THUK’s suite of medical services such telehealth or expert medical, or chronic condition management services, this Policy does not apply to the information that is collected during your use of those services. For the avoidance of doubt, the information collected during your use of those services, if any, will not be accessed or used for employment purposes. See the Notice of Privacy Practices that is applicable for the services you are using in order to understand what Personal Information is collected and processed by THUK during the course of your use of those services.



Collection of Personal Information

We collect from you the Personal Information outlined below to manage our employment relationship with you.

The Personal Information that we collect and use about you includes:

1. *Basic personal details collected during the application and interviewing process and throughout your employment with Teladoc Health UK (if applicable):*

Name, addresses, telephone numbers, personal email addresses, date of birth, gender, emergency contact information, marital status and dependents, government issued identification numbers such as national ID number or national insurance number, nationality, spoken languages, race, ethnicity, photograph, copy of passport or identity card, and information related to immigration and right-to-work (e.g., work permit / visa application information).

2. *Data collected during the application and interviewing process:*

CV/resume details and any information you provide to us on an application and during interviews, as well as information we gather from reference persons whose contact details you have provided to us, written or verbally, and background check reports.

3. *Job and benefit information collected upon and throughout your employment with THUK:*

Title(s), position description(s), working location(s), years of service, salary, work hours, vacation, and absences; copy of driving license (if relevant for your position); travelling and travel expenses data; termination date and reason for termination.

Information required for payroll purposes (e.g., bank account details, tax information); Information related to benefit entitlements and schemes such as insurance and stock options, e.g. details of participation and contributions made.

4. *Job performance information collected throughout your employment with THUK:*

Performance related information (e.g. assessments of your performance, objectives and goals, feedback and tests results); information relating to misconduct, investigations, and disciplinary actions; qualifications and personal development information, and competence assessments; learning and development records, certificates, licenses and vocational records; records of career and succession planning; ongoing background check reports and security data.

5. *System access and use information collected throughout your employment with THUK:*

Your access to and use of THUK's communication systems, applications, and software including your access to and modification of the information contained therein (e.g. corporate, client, and member information). This includes your THUK email account, and applies whether you access such information, systems, applications, software, and communication systems through company issued equipment or your personal device. User logs and access control related information, including physical access to THUK's premises. CCTV footage and other information obtained through electronic means such as swipe card records. Location information, including through GPS tracking technology on THUK-owned devices (e.g., laptops to locate and/or wipe lost or stolen laptops), or other devices owned by you which you use in connection with your employment with THUK.

6. *Any other information that you provide directly to us either verbally or in writing.*

Collection of Special Categories of Personal Information

We may also collect and process the following "special categories" of more sensitive Personal Information ("Special Categories of Personal Information") which will be collected and used only if and to the extent a local legislation requires.

1. *Information about your criminal background and health information.*



Grounds for Collection and Processing of Your Personal Information

As an employer and data controller, THUK collects, uses, and discloses your Personal Information in connection with your working relationship with us (“Contractual Obligations”) and in order to comply with THUK’s legal obligations (“Legal Obligations”). In some cases, we process your Personal Information based on our legitimate interests (“Legitimate Interests”), as permitted by Applicable Law. Our main legitimate interest is to continue to develop our business and improve the performance of THUK.

The purposes for which we collect and process your Personal Information include:

- ✓ Recruitment.
- ✓ Providing you with equipment, training, and support so that you can carry out your role. We do this in order to meet Contractual Obligations.
- ✓ Managing and documenting your performance including training, feedback and appraisals, investigations, and disciplinary action, and maintaining a personnel or service record. We do this in order to meet Contractual Obligations, Legal Requirements, and for Legitimate Interests.
- ✓ Compensation and benefits management, to ensure that you are paid and can take advantage of benefits offered by THUK and its partners. We do this in order to meet Contractual Obligations, Legal Requirements, and for Legitimate Interests.
- ✓ Organisation management and administration, including management of staffing resources, financial planning, corporate compliance, internal audits, and other administration. We process your Personal Information in this way to meet our Legitimate Interests in running our business effectively.
- ✓ Administration of absences in accordance with company and statutory leave programs, to ensure that we comply with our Legal Requirements (for statutory programs) or with our Contractual Obligations to you (for company programs beyond what is statutorily required).
- ✓ Communications. This may include facilitating communications to and between employees and contractors, and communications with other bodies (e.g., works councils where these exist, and regulatory authorities). We use Personal Information for this purpose in order to meet our Contractual Obligations, Legal Requirements and for our Legitimate Interests in managing our business, which includes ensuring that our staff can communicate with one another, and that we are able to communicate with our staff. This also includes use of your photograph on internal methods of communication including email communications, ID cards, and through other global employee development activities such as on the THUK SharePoint, during town hall meetings, and department meetings. If required by local law, we will get your consent to use your photograph for these purposes.
- ✓ THUK external marketing activities, including marketing photos, brochures, website content, videos, social media posts, and other related marketing activities. We will only use your personal data in creating this content with your consent.
- ✓ To meet our Legal Requirements, including health and safety requirements, by responding to requests for information from government agencies, and security investigations.
- ✓ Provision of employment references if requested by a potential employer (your consent will be obtained if required by Applicable Law).
- ✓ Administering our applications, software, and systems. This is necessary to meet our Legitimate Interests and Legal Requirements in ensuring that our systems are secure and are fit for use.
- ✓ Statistical and analytical purposes to understand and improve worker satisfaction and performance as necessary for our Legitimate Interests.
- ✓ Such other purposes as we may disclose to you from time to time pursuant to Section 15 herein.

Grounds for Collection and Processing of Special Categories of Personal Information

The grounds for our collection and processing of the Special Categories of Personal Information identified above is when it is necessary for us comply with specific Legal Obligations (e.g., disability claims, equal opportunity or anti-discrimination legislation, or employment law), Contract Obligations, or where we have your explicit consent to use it.

The purposes for which THUK may use your Special Categories of Personal Information include the following:



- ✓ To provide occupational health assessments and determine in limited cases if you are able to work. If we do this, we will make sure any health information collected is collected by a qualified medical professional and kept under their control. As required by Applicable Law, only the minimum amount of information is disclosed to us.
- ✓ To manage sickness absences (including short-term, long-term disability, and workers compensation) and family/parental leave (where applicable) as necessary for THUK to meet Legal Requirements.
 - ✓ Compliance with equal opportunity or anti-discrimination legislation or regulations (where applicable).
 - ✓ In connection with benefits including retirement-related benefits, private healthcare, and life insurance.
 - ✓ Background checks for employment or client engagement purposes, where permitted by applicable laws.
 - ✓ During legal proceedings (including prospective legal proceedings), obtaining legal advice, establishing, or defending legal claims, or otherwise where strictly necessary for the administration of justice in accordance with applicable laws.

Disclosure of Personal Information

We may share Personal Information, including Special Categories of Personal Information, with certain third parties, such as suppliers, clients and advisers that perform services on our behalf that are specific to managing your employment relationship with THUK.

We will only share your Personal Information with third parties for the purposes identified above in accordance with the Notice, or with your consent. We will endeavour to obtain assurances from each third party with whom we share your Personal Information (e.g., benefits providers, payroll vendor, human resources information management service vendor) that it will safeguard your Personal Information consistently with this Notice and will notify THUK if it makes a determination, it can no longer meet this obligation. If we have knowledge that a third party is using or disclosing Personal Information in a manner contrary to this Notice and Applicable Law, we will take reasonable steps to stop the use or disclosure.

Your Personal Information may also be disclosed or transferred to a third party in the event of any proposed or actual reorganisation, sale, merger, joint venture, assignment, or any other type of acquisition, disposal or financing of all or any portion of our company or of any company assets (including should THUK become insolvent, enter into receivership or any similar event occur). Should such an event take place, we will endeavour to direct the transferee to use Personal Information in a manner that is consistent with this Notice.

We may also disclose your Personal Information to third parties if necessary to comply with legal or regulatory requirements, for example to cooperate with regulatory authorities, law enforcement bodies, or courts, or if we believe that disclosure is necessary to protect our rights or those of a third party.

Transfer of Personal Information across Borders

Teladoc is a global company, with offices located throughout the world. As a result, your Personal Information may be transferred to other Teladoc offices for the purposes identified above. Any such transfer shall take place only in accordance with and as permitted by the law of your jurisdiction, but please be aware that the laws and practices relating to the protection of Personal Information are likely to be different. Regardless, in all events, we shall apply the provisions of this Notice to your Personal Information wherever it is located. For transfers from the European Economic Area ("EEA") to the United States (in particular to Teladoc Health, Inc.), THUK uses standard contractual clauses. For more information about these transfers, please email dataprotectionofficer@Teladochealth.com.

THUK may also use third parties, for purposes described above, that reside outside of your jurisdiction. THUK will rely on standard contractual clauses, or any other method authorised by Applicable Law for such transfers of Personal Information.



Retention of Your Personal Information

The length of time we retain your Personal Information depends on the status of our relationship with you and the requirements of Applicable Law. We will retain your Personal Information for as long as your employment with us lasts, and for a certain period after your employment with us has ended. To determine that period, we consider our legal and regulatory obligations (such as financial reporting obligations and equal opportunity or anti-discrimination reporting obligations) and for the statutory periods necessary to resolve disputes, make and defend legal claims, conduct audits, and/or enforce our agreements.

Security of Your Personal Information

We will take reasonable precautions designed to protect Personal Information in our possession from loss, misuse and unauthorised access, disclosure, alteration, and destruction. Access to our systems that store your Personal Information is restricted by means of a user ID and password that are issued only to authorised personnel. In turn, you need to prevent unauthorised access to your Personal Information by selecting and protecting your password appropriately and limiting access to your computer and browser by signing off after you have accessed your Personal Information.

Your Rights with Respect to Your Personal Information

Subject to Applicable Law, you have certain rights in relation to your Personal Information, including the right to object to our collection or use of your Personal Information in some of the circumstances described above. If you have given your consent to any use of Personal Information, you can withdraw it at any time. If you withdraw your consent, however, in certain circumstances THUK may not be able to fulfil our contractual and employment-related obligations to you.

The additional rights you may have, subject to Applicable Law, include the rights to:

- access a copy of Personal Information we hold about you.
- update, correct, amend Personal Information that is demonstrated to be inaccurate or incomplete.
- restrict our use of your Personal Information in certain circumstances.
- request that we transmit your Personal Information to a third party in a usable electronic format (known as the right to “data portability”); and
- Request to erase your personal data that is determined to have been processed in violation of Applicable Law or after your employment relationship is over, as long as we do not have the legal or regulatory obligation to conserve it.

Who to Contact with Questions or Concerns

If you have an inquiry or complaint regarding this Notice or the collection or use of your Personal Information or want to exercise any of your data protection rights, please email ukdpo@teladochealth.com.

Changes to this Notice

We may amend this Notice from time to time. If we make any material changes in the way we collect or use your Personal Information, we will notify you by posting an announcement on THUK SharePoint, or by sending you an email. Where required by applicable law, we will afford you the opportunity to consent or to opt out of any new use or disclosure.