

Data Privacy Notice – UK Share Incentive Plan

This privacy notice explains how your personal data is collected, used and stored by C&C Group plc in relation to Part B of the C&C Group plc Profit Sharing Scheme, also known as the UK Share Incentive Plan (SIP). It applies to C&C employees within the UK who are eligible to participate in the Plan. This notice also gives you information about your legal rights granted under data protection laws.

We have a Data Protection Officer (DPO) to guide the business and oversee our use of your personal information. If you have any questions or concerns about this notice, or how your personal data is used you can contact the DPO at GDPR@candcgroup.com.

This privacy notice was last updated in September 2025. We may update this notice at any time. You can request the most recent copy from our DPO.

The purpose of the processing

We will use your personal information to run and administer the Plan, and to comply with our tax, regulatory and legal obligations. This includes the use of the C&C Group Equity Portal (EquatePlus platform), which is provided by our share plan administrator, Computershare, on our behalf.

We need a reason ('lawful basis') to process your personal information in relation to the Plan and the C&C Group Equity Portal. We rely on our 'legitimate interests' to use your personal data when offering participation to the Plan, and to inform you of the details relevant to purchasing shares in the company through the SIP.

If you elect to participate in the Plan, we rely on 'performance of a contract' when using your personal data to allow us to record and manage your participation, contributions, entitlements, and to pay dividends via the SIP trustee. We'll also use it to permit Computershare to send communications about your participation in the SIP and respond to any queries or complaints.

In some circumstances, the processing is necessary so that we can perform our legal, regulatory and compliance obligations such as obtaining professional advice in relation to the SIP, complying with statutory HMRC reporting requirements, and meeting other reporting purposes, both internally and externally.

Personal data types

To carry out the purposes above we hold and process the following personal data:

- Name
- Contact information including work and (if available) home email address
- Home address
- Date of Birth

- National Insurance (NI) number
- Payroll number
- Employing entity, job title, and employment dates
- Information relating to your Plan participation such as date of joining and number of shares held.

Data sharing

We may have to share your data with other people and organisations. We require these third parties to respect the security of your data and to treat it correctly. Where a third party is acting as a 'data processor', they'll act solely on our instructions and will only use your information for that specific purpose.

We may share your information with:

- Our SIP administrators.
- Governmental bodies, regulators, law enforcement agencies, insurers, our accountants, auditors, legal or professional advisors, or court or tribunal services where we need to, to comply with legal obligations, exercise or defend our legal rights, or to prevent and detect crime or prosecute offenders.
- Other third parties, for example in the context of the possible sale or restructuring of the business.

International transfers of personal data

Your personal data may be transferred to and stored in locations outside the UK and the European Economic Area (EEA). This will typically occur when we use service providers located outside of these areas. These data transfers require us to follow certain rules under data protection law to ensure that your data will be adequately protected, so we'll only transfer data to countries that have been confirmed as protecting personal data to UK or EEA standards, or where we have put contractual commitments in place which make sure the data is protected to these standards.

Please contact our DPO if you want to find out more about where personal data is transferred to, or the safeguards we have in place.

Data Retention

Your data is only kept for as long as it's needed to fulfil the purposes we collected it for, including any operational, legal or reporting requirements. To determine the right retention period, we consider why we're using your data, the amount, nature, and sensitivity of it, the potential risk of harm from unauthorised use or disclosure, and any applicable legal requirements.

Our current retention policy is that your data will be held for as long as you hold shares in C&C Group and for as long as is required to comply with legal, regulatory and tax obligations.

Your rights in relation to your personal data

By law you are granted a number of rights over how we use your personal data. You can:

- Request access to your personal information (commonly known as a "data subject access request"). This lets you receive a copy of the personal information we hold about you to check we're using it lawfully.
- Request the correction of incomplete or inaccurate personal information that we hold about you.
- Request erasure of your personal information in certain circumstances. You also have the right to ask us to delete or remove your personal information where you have exercised your 'right to object' (see below).
- Object to processing of your personal information in certain circumstances.
- Request the restriction of processing of your personal information. This enables you to ask us to suspend the processing of personal information about you, for example if you want us to prove its accuracy or the reason for processing it.
- Request the transfer of your personal information to another organisation.
- Request a review of any processing decision made about you using a solely automated process. Please be advised that we do not generally anticipate that we will make decisions about employees participating in the SIP based solely on automated means, but if we do you will be made aware of this and you have the right to contest any decision made and ask that it is reviewed.
- Withdraw consent: where your consent is the 'lawful basis' for the processing, you have the right to withdraw your consent at any time.
- Complain to C&C Group if you think that the company has used your personal information in a way that doesn't comply with data protection laws.

If you want to exercise any of these rights please contact GDPR@candcgroup.com

Right to complain to a data protection regulator

We strive to collect, use and protect your personal information in line with data protection laws and guidance. If you do not believe we have handled your personal data appropriately, please get in touch with our Data Protection Officer so that we can try to resolve your concerns.

While we hope that we can resolve any concerns with you, you can complain to the data Protection regulator whether or not you have exhausted our internal procedure:
<https://ico.org.uk>