

GDPR PRIVACY NOTICE FOR JOB APPLICANTS

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Introduction

As part of any recruitment process, the Company collects and processes personal information, or personal data, relating to job applicants. This personal information may be held by the Company on paper or in electronic format.

The Company is committed to being transparent about how it handles your personal information, to protecting the privacy and security of your personal information and to meeting its data protection obligations under the General Data Protection Regulation ("GDPR"). The purpose of this privacy notice is to make you aware of how and why we will collect and use your personal information during the recruitment process. We are required under the GDPR to notify you of the information contained in this privacy notice.

This privacy notice applies to all job applicants, whether they apply for a role directly or indirectly through an employment agency. It is non-contractual.

The Company has appointed a company representative to oversee compliance with this privacy notice. If you have any questions about this privacy notice or about how we handle your personal information, please contact – Susanne Meyer.

Data protection principles

Under the GDPR, there are six data protection principles that the Company must comply with. These provide that the personal information we hold about you must be:

1. Processed lawfully, fairly and in a transparent manner.
2. Collected only for legitimate purposes that have been clearly explained to you and not further processed in a way that is incompatible with those purposes.
3. Adequate, relevant and limited to what is necessary in relation to those purposes.
4. Accurate and, where necessary, kept up to date.
5. Kept in a form which permits your identification for no longer than is necessary for those purposes.
6. Processed in a way that ensures appropriate security of the data.

The Company is responsible for, and must be able to demonstrate compliance with, these principles. This is called accountability.

What types of personal information do we collect about you?

Personal information is any information about an individual from which that person can be directly or indirectly identified. It doesn't include anonymised data, i.e. where all identifying particulars have been removed. There are also "special categories" of personal information, and personal information on criminal convictions and offences, which requires a higher level of protection because it is of a more sensitive nature. The special categories of personal information comprise information e.g. about an individual's religious, health and biometric data.

The Company collects, uses and processes a range of personal information about you during the recruitment process. This includes (as applicable):

- your contact details, including your name, address, telephone number and personal e-mail address, Skype.
- personal information included in a CV, any application form, cover letter or interview notes
- references
- copies of qualification certificates
- other background check documentation
- details of your education, skills, qualifications, experience and work history with previous employers
- next of kin details, your nationality
- health condition
- our evaluation of candidates' suitability for employment
- your photograph

The Company may also collect, use and process the following special categories of your personal information during the recruitment process (as applicable):

- whether or not you have a disability for which the Company needs to make reasonable adjustments during the recruitment process
- information about criminal convictions and offences

How do we collect your personal information?

The Company collects personal information about you during the recruitment process either directly from you or sometimes from a third party such as an employment agency. We may also collect personal information from other external third parties, such as references from current and former employers, information from background check providers, information from criminal record checks. Other than employment agencies, the Company will only seek personal information from third parties during the recruitment process once an offer of employment or engagement has been made to you and we will inform you that we are doing so.

You are under no statutory or contractual obligation to provide personal information to the Company during the recruitment process.

Your personal information may be stored in different places, including on your application record, in the Company's HR management system and in other IT systems, such as the e-mail system.

Why and how do we use your personal information?

We will only use your personal information when the law allows us to. These are known as the legal bases for processing. We will use your personal information in one or more of the following Circumstances:

- where you send us an application expressing your consent that we process your data
- Where we have a legitimate interest to process your data after you have sent application to us, e.g. to evaluate your application during the recruitment process
- where we need to do so to take steps at your request prior to entering into a contract with you, or to enter into a contract with you
- where we need to comply with a legal obligation

The purposes for which we are processing, or will process, your personal information are to:

- manage the recruitment process and assess your suitability for employment or engagement
- decide to whom to offer a job
- comply with statutory and/or regulatory requirements and obligations.
- ensure compliance with your statutory rights including International/local laws.
- ensure effective HR, personnel management and business administration
- monitor equal opportunities
- enable us to establish, exercise or defend possible legal claims

Please note that we may process your personal information without your consent, in compliance with these rules, where this is required or permitted by law.

Why and how do we use your sensitive personal information?

We will only collect and use your sensitive personal information, which includes special categories of personal information, such as information about criminal convictions and offences, health condition & religion belief, when the law allows us to.

We may also process information about your health condition, religion belief and information about any criminal convictions and offences where we have your explicit written consent. In this case, we will first provide you with full details of the personal information we would like and the reason we need it, so that you can properly consider whether you wish to consent or not. It is entirely your choice whether to consent. Your consent can be withdrawn at any time.

The purposes for which we are processing, or will process is health condition, religion belief and information about any criminal convictions and offences, are to:

- assess your suitability for employment or engagement
- comply with statutory and/or regulatory requirements and obligations, e.g.

- carrying out criminal record checks
- ascertain your fitness to work
- ensure effective HR, personnel management and business administration
- monitor equal opportunities

We may also occasionally use your special categories of personal information, and information about any criminal convictions and offences, where it is needed for the establishment, exercise or defense of legal claims.

Change of purpose

We will only use your personal information for the purposes for which we collected it, i.e. for the recruitment exercise for which you have applied.

However, if your job application is unsuccessful, the Company may wish to keep your personal information on file for in case there are future suitable employment opportunities with us. We will ask for your consent before we keep your personal information on file for this purpose. Your consent can be withdrawn at any time.

Who has access to your personal information?

Your personal information may be shared internally within the Company for the purposes of the recruitment exercise, including with members of the HR department, members of the recruitment team, members of training team, managers in the department which has the vacancy and IT staff if access to your personal information is necessary for the performance of their roles.

The Company will not share your personal information with third parties during the recruitment process unless your job application is successful and we make you an offer of employment or engagement. At that stage, we may also share your personal information with third parties (and their designated agents), including:

- external organisations for the purposes of conducting pre-employment reference and employment background checks
- former employers, to obtain references
- professional advisors, such as lawyers
- traveling companies
- hotels
- medical facilities,
- insurance companies
- taxation authorities,
- training organizations
- immigration authorities
- banks
- courts administration authorities (on request)
- accounting outsourcing company

We may also need to share your personal information with a regulator or to otherwise comply with the law.

How does the Company protect your personal information?

The Company has put in place measures to protect the security of your personal information. It has internal policies, procedures and controls in place to prevent your personal information from being accidentally lost or destroyed, altered, disclosed or used or accessed in an unauthorized way. In addition, we limit access to your personal information to those employees, contractors and other third parties who have a business need to know in order to perform their job duties and responsibilities. You can obtain further information about these measures from our company representative.

Where your personal information is shared with third parties, we require all third parties to take appropriate technical and organizational security measures to protect your personal information and to treat it subject to a duty of confidentiality and in accordance with data protection law. We only allow them to process your personal information for specified purposes and in accordance with our written instructions and we do not allow them to use your personal information for their own purposes.

The Company also has in place procedures to deal with a suspected data security breach and we will notify the applicable supervisory authority or regulator and you of a suspected breach where we are legally required to do so.

For how long does the Company keep your personal information?

The Company will only retain your personal information for as long as is necessary to fulfil the purposes for which it was collected and processed. |

If your application for employment or engagement is unsuccessful, the Company will generally hold your personal information for 12 months hard copy, 12 months encrypted and protected data, after the end of the relevant recruitment exercise but this is subject to: (a) any minimum statutory or other legal, tax, health and safety, reporting or accounting requirements for particular data or records, and (b) the retention of some types of personal information for up to 12 months to protect against legal risk. |

If your application for employment or engagement is successful, personal information gathered during the recruitment process will be retained for the duration of your employment or engagement and in accordance with the privacy notice for employees, workers and contractors.

Personal information which is no longer to be retained will be securely and effectively destroyed or permanently erased from our IT systems and we will also require third parties to destroy or erase such personal information where applicable.

In some circumstances we may anonymize your personal information so that it no longer permits your identification. In this case, we may retain such information for a longer period.

Your rights in connection with your personal information

As a data subject, you have a number of statutory rights. Subject to certain

conditions, and in certain circumstances, you have the right to:

- request access to your personal information - this is usually known as making a data subject access request and it enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it
- request rectification of your personal information - this enables you to have any inaccurate or incomplete personal information we hold about you corrected
- request the erasure of your personal information - this enables you to ask us to delete or remove your personal information where there's no compelling reason for its continued processing, e.g. it's no longer necessary in relation to the purpose for which it was originally collected
- restrict the processing of your personal information - this enables you to ask us to suspend the processing of your personal information, e.g. if you contest its accuracy and so want us to verify its accuracy
- object to the processing of your personal information - this enables you to ask us to stop processing your personal information where we are relying on the legitimate interests of the business as our legal basis for processing and there is something relating to your particular situation which makes you decide to object to processing on this ground
- data portability - this gives you the right to request the transfer of your personal information to another party so that you can reuse it across different services for your own purposes.

If you wish to exercise any of these rights, please contact our company representative or e-mail to company representative. We may need to request specific information from you in order to verify your identity and check your right to access the personal information or to exercise any of your other rights. This is a security measure to ensure that your personal information is not disclosed to any person who has no right to receive it.

If you believe that the Company has not complied with your data protection rights, you have the right to make a complaint to the applicable supervisory authority or regulator.

Changes to this privacy notice

The Company reserves the right to update or amend this privacy notice at any time. We will issue you with a new privacy notice when we make significant updates or amendments.

I acknowledge receipt of this data protection policy and I confirm that I have read and understood it. I understand that I am responsible for complying with the terms of this policy.

Signed:

Print name:

Dated: