

Recruitment Privacy Notice

1. Introduction

Instarmac Group plc hold personal data about our job applications and applications, current and former employees for a variety of business purposes. We are committed to protecting privacy and complying with the Data Protection Act and also General Data Protection Regulations (GDPR) and we will process any personal data under the terms set out in our privacy notices.

2. Scope

This privacy notice applies to job applications and applicants. We may supplement or amend this privacy notice policy from time to time.

3. What information do we collect?

We collect personal data (including sensitive personal data) that you submit to us when you apply for a role with us. We will treat the data as confidential.

Personal data we gather may include:

- Individuals' contact details and other contact points.
- Educational background, details of certificates and diplomas, education and skills.
- Driving licence.
- Marital status.
- Nationality.
- Job title.
- CV and correspondence with referees and previous employers.
- Financial, pay and bonus details.
- Images associated with the above (such as driving licence, passport).
- Visual footage from site CCTV when attending interview.
- Audio footage from telephone assessments undertaken as part of the recruitment process, role dependent.
- Depending on the role applied candidate may be asked to complete a Personality Profile Analysis, which will be processed by a third party.
- Notes and correspondence relating to your interview(s) and assessments undertaken.
- Anything else that's in your application, CV, cover letter, other correspondence or any references.

The above is not an exhaustive list.

Sensitive personal data we may gather include racial or ethnic origin, political opinions, religious or similar beliefs, trade union membership (or non-membership), physical or mental health condition and criminal offences or related proceedings.

4. How do we use your information?

When individuals apply to work at Instarmac, we will only use the information supplied to us to process their application and to consider them for the role in which they have applied. We may also share this personal data with other appropriate people within Instarmac Group plc for the same reasons.

If we decide to make an offer of employment, we may process personal data so that we can raise and offer a contract of employment. Where we want to disclose information to a third party, for example where we want to take up references, we will not do so without individual's consent beforehand. As part of the offer, prospective employees will be provided with the Data Protection Policy, which outlines our full privacy notice for employees.

In situations where candidates have not been successful, we will of course stop processing data. However, applicant records will be retained for a 6-month period so that other suitable roles can be considered, unless the individual requests the removal sooner.

We might also use data to understand more about demographics of people applying to work with us. This would be anonymised and stops being personal data as we wouldn't be able to identify individuals. And it wouldn't be used to inform any decisions about an individual's application.

5. Disclosing your personal data

The security of your data is very important to us and as outlined we might share your data with other colleagues, as part of the interview and hiring process. Further there may also be third parties who would process your personal data on our behalf. When we outsource the processing of your personal information to third parties or provide your personal information to third party service providers, we oblige those third parties to protect your personal information with appropriate security measures and prohibit them from using your personal information for their own purposes or from disclosing your personal information to others without your explicit consent.

Some third party contractors (and/or subcontractors) who provide services (such as an e-learning platform), process some personal data outside of the EU. We will obtain your informed consent for the transfer of this data.

We will take all steps reasonably necessary to ensure that your personal information is treated securely and in accordance with this Privacy Notice, and certified to the EU-U.S and Swiss-U.S Privacy Shield Framework.

We will ensure appropriate technical and organisational measures to protect personal data consistent with the applicable privacy and data security laws of the UK, and generally protect the confidentiality and security of personal data.

- We may also share your information with third parties in the following situations, where it's legally allowed, where we are required to do so by law, court order or governmental authority.
- If we believe doing so is necessary to protect the rights property, security or safety of colleagues, the public or property.
- Where required to defend ourselves legally.
- Where necessary to investigate and defend ourselves against any claims or allegations.

6. Retaining your personal data

We will only hold on to personal data for as long as is necessary so we can process it, as set out in this privacy notice. For successful applications we will continue to process your personal data in line with the employee privacy notice as contained within the Data Protection Policy. For unsuccessful applications, we will delete your data within 6 months, unless you request the removal sooner.

Please note that there may be legal or regulatory reasons which mean we need to hold on to personal data for longer.

7. Your rights

Candidates have the following rights in relation to personal data:

- A right to access any personal data held by us.
- A right to have inaccurate personal data rectified.
- A right to object to processing where lawful basis is that it is in our legitimate interests, but please note that we may still process personal data where there are other relevant lawful bases.
- A right to complain to a data protection supervisory authority in respect of the processing of personal data.
- A right to request that any information held on them is deleted or removed, and any third parties who process or use that data must also comply with the request. An erasure request can only be refused if an exemption applies.

Whilst we will try to accommodate any request made in respect of the above, these are not absolute rights. This means that we may have to refuse a request or may only be able to comply with it in part.

Where a request is made we will require proof of identification. We may also obtain clarification on the request. If we receive repeated requests or have reason to believe requests are being made unreasonably we may not be required to respond.

8. Contact us

If you have any questions or comments about our privacy policies or would like to update or view your information, please feel free to contact us at dataprotection@instarmac.co.uk

This policy is authorised by



JOHN HOLCROFT
MANAGING DIRECTOR
May 2019