

## Candidate Privacy Notice

### Data controller: PrimeVigilance

As part of the recruitment process at PrimeVigilance we collect and process personal data relating to job applicants. PrimeVigilance is committed to being transparent about how it collects and uses that data and to meeting our data protection obligations.

### What information does the organisation collect?

PrimeVigilance collects a range of information about you as part of the recruitment process. This includes:

- your name, address and contact details, including email address and telephone number;
- details of your qualifications, skills, experience and employment history;
- information about your current level of remuneration, including benefit entitlements;
- whether or not you have a disability for which we need to make reasonable adjustments during the hiring process;
- information about your entitlement to work in the country where the role you have applied is located;
- Desired salary expectations; and
- Skills/competencies assessments

PrimeVigilance may collect this information in a variety of ways. For example, data might be contained in application forms, CVs or resumes, obtained from your passport or other identity documents, or collected through interviews or other forms of assessment, which may include online tests.

PrimeVigilance will also collect personal data about you from third parties, such as references supplied by former employers, information from employment background check providers and information from criminal records checks if legally applicable in the country of residence. PrimeVigilance will seek information from third parties only once a job offer has been accepted by you and will inform you that it is doing so.

Data will be stored in a range of different places, including on your application record, in HR management systems and on other IT systems (including email).

### Why does the organisation process personal data?

PrimeVigilance needs to process data to take steps at your request prior to entering into a contract with you. It also needs to process your data to enter into a contract with you.

In some cases, the organisation needs to process data to ensure that it is complying with our legal obligations. For example, it is required to check a successful applicant's eligibility to work in specific countries before employment starts.

PrimeVigilance has a legitimate interest in processing personal data during the recruitment process and for keeping records of the process. Processing data from job applicants allows the organisation to manage the recruitment process, assess and confirm a candidate's suitability for employment and decide to whom to

offer a job. The organisation may also need to process data from job applicants to respond to and defend against legal claims.

PrimeVigilance may process special categories of data, such as information about ethnic origin, sexual orientation or religion or belief, to monitor talent statistics, if legally required. It may also collect information about whether or not applicants are disabled to make reasonable adjustments for candidates who have a disability. PrimeVigilance processes such information to carry out its obligations and exercise specific rights in relation to employment.

If your application is unsuccessful, PrimeVigilance may keep your personal data on file in case there are future employment opportunities for which you may be suited. We will ask for your consent before it keeps your data for this purpose and you are free to withdraw your consent at any time.

### **Who has access to data?**

Your information will be shared internally for the purposes of the recruitment exercise. This includes members of the HR and recruitment team, interviewers involved in the recruitment process, managers in the business area with a vacancy and IT staff if access to the data is necessary for the performance of their roles.

PrimeVigilance will not share your data with third parties, unless your application for employment is successful and an offer of employment is accepted. The organisation will then share your data with former employers to obtain references for you. We will then only share applicable data to initiate the process.

### **How does the organisation protect data?**

The organisation takes the security of your data seriously. It has internal policies and controls in place to ensure that your data is not lost, accidentally destroyed, misused or disclosed, and is not accessed except by our employees in the proper performance of their duties. More information how PrimeVigilance respects and protects privacy can be found in our privacy notice.

### **For how long does the organisation keep data?**

If your application for employment is unsuccessful, the organisation will hold your data on file for 12 months after the end of the relevant recruitment process or for as long as defined by specific country's statutory limitation period. If you consent to PrimeVigilance to keep your personal data on file, the organisation will hold your data on file for a further 12 months for consideration for future employment opportunities. At the end of that, period or once you withdraw your consent; your data is deleted or destroyed.

### **Your rights**

As a data subject, you have a number of rights. You can:

- access and obtain a copy of your data on request;
- require the organisation to change incorrect or incomplete data;
- require the organisation to delete or stop processing your data, for example where the data is no longer necessary for the purposes of processing;
- object to the processing of your data where the organisation is relying on its legitimate interests as the legal ground for processing; and

- ask the organisation to stop processing data for a period if data is inaccurate or there is a dispute about whether or not your interests override the organisation's legitimate grounds for processing data.

If you would like to exercise any of these rights, please contact PrimeVigilance Human Resources Department.

If you believe that the organisation has not complied with your data protection rights, you can complain to the Information Commissioner.

### **What if you do not provide personal data?**

You are under no statutory or contractual obligation to provide data to the organisation during the recruitment process. However, if you do not provide the information, the organisation may not be able to process your application properly or at all.

You are under no obligation to provide information for equal opportunities monitoring purposes and there are no consequences for your application if you choose not to provide such information.

### **Automated decision-making**

Recruitment processes are not based solely on automated decision-making.