

**Data Controller:** Greene, Tweed & Co., Limited

Company No. 01643349

Registered Office: Mere Way, Ruddington Fields, Ruddington, Nottingham, NG11 6JS

(the "Company").

## **JOB APPLICANT PRIVACY NOTICE**

As part of the recruitment process, the Company collects and processes personal data relating to job applicants. The Company is committed to being transparent about how it collects and uses that data and to meeting its data protection obligations.

### **What information does the Company collect?**

The Company collects a range of information about you. 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

The Company collects this information in a variety of ways. For example, data might be collected through interviews or other forms of assessment.

The Company will also collect personal data about you from third parties, such as CV's or resumes from Recruitment Agencies. The Company will only seek reference information once a job offer has been made to you and will inform you that it is doing so.

Data is stored in a range of different places, including in the Company's HR management systems and in other IT systems operated by or on behalf of the Company (including the Company's email system).

### **Why does the Company process personal data?**

In some cases, the Company needs to process data to ensure that it is complying with its legal obligations. The Company has a legitimate interest in processing personal data during the recruitment process and for keeping records of the process. The Company processes your personal data to establish an employment relationship in compliance with Art. 6 Para. 1 S. 1 GDPR. The processing takes place exclusively for the purpose of assessing your suitability, qualifications and professional performance with regard to the position for which you are applying. The Company may also need to process data from job applicants to respond to and defend against legal claims.

Where the Company relies on legitimate interests according to Art. 6 Para. 1 S. 1 GDPR as a reason for processing data, it has considered whether or not those interests are overridden by the rights and freedoms of data subjects and has concluded that they are not. The Company will not use your data for any purpose other than the recruitment exercise for which you have applied.

### **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, managers and other employees involved in the recruitment process and IT employees if access to the data is necessary for the performance of their roles. The Company will not share your data with third parties.

Your data will be transferred outside the European Economic Area (EEA) to our US facility in order to carry out the recruitment exercise. Transfers of personal data to the US are subject to formal contractual arrangements between Greene, Tweed & Co., Limited and Greene, Tweed Services LLC.

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

The Company takes the security of your data seriously and has internal policies and controls in place as well as suitable technical and organizational measures to ensure that your data is not lost, accidentally destroyed, misused or disclosed and is not accessed except by those persons authorised to do so in the performance of their duties.

Where the organisation engages third parties to process personal data on its behalf, they do so on the basis of an order processing contract in compliance with confidentiality.

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

If your application for employment is unsuccessful, the Company will hold your data on file for up to 12 months to fulfil our legal obligations in the application process

If your application for employment is successful, personal data gathered during the recruitment process will be transferred to your personnel file and retained during your employment. The periods for which your data will be held will be provided to you in a new Privacy Notice.

### **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 Company to change incorrect or incomplete data
- require the Company 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 Company is relying on its legitimate interests as the legal ground for processing
- ask the Company to stop processing data for a period if data is inaccurate or there is a dispute about whether or not your interest override the Company's legitimate grounds for processing data

If you would like to exercise any of these rights, please contact a member of the European HR team. If you believe that the Company has not complied with your data protection rights, you can complain

to a member of the European HR Team or to the Information Commissioner's Office. Information about how to do this is available on their website at [www.ico.org.uk](http://www.ico.org.uk)

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

You are under no statutory or contractual obligation to provide data to the Company during the recruitment process. However, if you do not provide the information, the Company may not be able to process your application properly or at all. If your application is successful, it will be a condition of any job offer that you provide evidence of your right to work in the UK.

I confirm that I have read and understood the contents of the Job Applicant Privacy Notice