

### idverde Candidate Privacy Policy

# What is the purpose of this document?

idverde UK Limited is a "controller" in relation to personal data. This means that we are responsible for deciding how we hold and use personal information about you. You are being sent a copy of this privacy notice because you are applying for work with us (whether as an employee, worker or contractor). It makes you aware of how and why your personal data will be used, namely for the purposes of the recruitment exercise, and how long it will usually be retained for. It provides you with certain information that must be provided under the UK General Data Protection Regulation (UK GDPR).

### Data protection principles

We will comply with data protection law and principles, which means that your data will be:

- Used lawfully, fairly and in a transparent way.
- Collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes.
- Relevant to the purposes we have told you about and limited only to those purposes.
- Accurate and kept up to date.
- Kept only as long as necessary for the purposes we have told you about.
- Kept securely.

# Who is your personal information collected from?

We collect personal information about candidates from the following sources:

- You, the candidate;
- Recruitment agencies;
- Companies that carry out employment screening and checks for us;
- Publicly accessible sources, where permissible.

### The kind of information we hold about you

In connection with your application for work with us, we will collect, store, and use the following categories of personal information about you:

- The information you have provided on our application form or your cv, including name, address, telephone number, personal email address, education history, qualifications and employment history.
- Any information you provide to us during the interview process.



Information obtained from sources other than yourself previously referred to in this notice.

This may involve us collecting, storing and using the following types of more sensitive personal information, where you consent such as:

- Information about your race or ethnicity, religion or beliefs
- Information about your health, including any medical condition.
- Information about criminal convictions and offences.

### How we will use information about you

We will use the personal information we collect about you to:

- Assess your skills, qualifications, and suitability for the role.
- Carry out background and reference checks, where applicable.
- Communicate with you about the recruitment process.
- Keep records related to our hiring processes.
- Comply with legal or regulatory requirements.

We can use your personable information:

- To take steps before entering into an employment contract with you;
- To decide whether to enter into an employment contract with you (our "legitimate interests"); and
- To comply with the law.

#### If you fail to provide personal information

If you fail to provide information when requested, which is necessary for us to consider your application (such as evidence of qualifications or work history), we will not be able to process your application successfully. For example, if we require a credit check or references for this role and you fail to provide us with relevant details, we will not be able to take your application further.

### How we use particularly sensitive personal information

Where appropriate we will use your particularly sensitive personal information in the following ways:

- We use information about disability to consider whether we need to provide appropriate adjustments during the recruitment process, for example whether adjustments need to be made during interview.
- We use information about racial or ethnic origin, religious or philosophical beliefs, disability or sexual orientation to ensure meaningful equal opportunity monitoring and reporting.

#### Information about criminal convictions

We may will process information about criminal convictions.



We are required by certain of our clients to carry out a criminal records check in order to satisfy ourselves that there is nothing in your criminal convictions history which makes you unsuitable for the role and where required, we will, with your consent, collect information about your criminal convictions history.

### **Automated decision-making**

We do not make decisions that will have a significant impact on you based solely on automated decision-making.

#### Data sharing

### Why might you share my personal information with third parties?

We share your personal data with third parties who need to know for the purpose of processing your application, such as our recruitment agency partners and providers who carry out pre-employment screening on our behalf. We also share your personal data with the relevant team within *i*dverde and its group companies who need to see your personal data as part of their job, whether to assess your application or to process it.

#### **Cross-border data transfers**

Where we transfer your personal information to the European Economic Area (EEA) (such as to other members of the *i*dverde group) those transfers are made in accordance with the UK government's adequacy decision in favour of countries in the EEA.

#### **Data security**

We have put in place appropriate security measures to prevent your personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal information to those employees, agents, contractors and other third parties who have a business need-to-know. They will only process your personal information on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected data security breach and will notify you and any applicable regulator of a suspected breach where we are legally required to do so.

# **Data retention**

#### How long will you use my information for?

We will retain your personal information for a period of 12 months after we have communicated to you our decision about whether to appoint you to role. We retain your personal information for that period so that we can show, in the event of a legal claim, that we have not discriminated against candidates on prohibited grounds and that we have conducted the recruitment exercise in a fair and transparent way. After this period, we will securely destroy your personal information in accordance with applicable laws and regulations.



#### Rights of access, rectification, erasure, objection, restriction and data portability

### Your rights in connection with personal information

Under certain circumstances, by law you have the right to:

- Request access to your personal information (commonly known as making a "data subject access request"). This 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 the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.
- Request erasure of your personal information. This enables you to ask us to delete or remove personal information where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal information where you have exercised your right to object to processing (see below).
- **Object to processing** of your personal information where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground. You also have the right to object where we are processing your personal information for direct marketing purposes.
- 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 establish its accuracy or the reason for processing it.
- Request the transfer of your personal information to another party.

If you want to review, verify, correct or request erasure of your personal information, object to the processing of your personal data, or request that we transfer a copy of your personal information to another party, please contact <a href="mailto:gdpr@idverde.co.uk">gdpr@idverde.co.uk</a>. Please note that

#### Third party sites

The careers page on our website contains links to third party websites managed by our recruitment partners. We do not control these sites. These sites contain privacy notices detailing how our recruitment partners will collect, share and use your data.

# **Questions or complaints**

If you have any questions or concerns about this privacy notice or how we handle your personal information, please contact <a href="mailto:gdpr@idverde.co.uk">gdpr@idverde.co.uk</a>.

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO) who is responsible for data protection issues in the UK and whose contact details are 0303 123 1113. Full details about the ICO can be found at its website on <a href="https://www.ico.org.uk">www.ico.org.uk</a>. Postal address for the ICO is The Office of the Information Commissioner, Wycliffe House, Water Lane, Wilmslow SK9 5AF.