

PRIVACY NOTICE FOR APPLICANTS / CANDIDATES EDE & RAVENSCROFT LTD

1. What is the purpose of this document?

Ede & Ravenscroft Ltd ("**we**" or the "**Company**") is a "data controller". This means that the Company is responsible for deciding how we hold and use personal data 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 UK GDPR.

2. 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; and
- kept securely.

3. 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 data about you:

- the information you have provided to us in your CV and covering letter;
- the information you have provided on our application form, including name, title, address, telephone number, personal email address, date of birth, gender, employment history, qualifications;
- any information you provide to us during an interview; and
- psychometric & skill based test results as applicable.

We may also collect, store and use the following "special categories" of more sensitive personal data:

- information about your race or ethnicity, religious beliefs, sexual orientation and political opinions; and
- for certain roles only information about criminal convictions and offences.

4. How is your personal data collected?

We collect personal data about candidates from the following sources:

- you, the candidate;
- our third party recruitment agencies, from whom we collect the following categories of data: name, title, address, telephone number, date of birth, gender, employment history, qualifications;
- our third party background check provider, from whom we collect the following categories of data: information around criminal convictions and financial history for candidates for the roles specified below, including from the DBS in respect of criminal convictions; and
- your named referees, from whom we obtain a standard reference.

5. How we will use information about you

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

- assess your skills, qualifications, and suitability for the work or role;
- carry out background and reference checks, where applicable;
- communicate with you about the recruitment process;
- keep records related to our hiring processes; and
- comply with legal or regulatory requirements.

It is in our legitimate interests to decide whether to appoint you to the relevant role since it would be beneficial to our business to appoint an appropriate person to that role. We also need to

process your personal data to decide whether to enter into a contract of employment or engagement with you.

Having received your CV and covering letter, or application form, and the results from any tests we asked you to complete as part of our application process, we will then process that information to decide whether you meet the basic requirements to be shortlisted for the role. If you do, we will decide whether your application is strong enough to invite you for an interview. If we decide to call you for an interview, we will use the information you provide to us at the interview to decide whether to offer you the role or work. If we decide to offer you the role or work, we will then take up references, carry out a criminal record checks where appropriate, and carry out any other relevant checks before confirming your appointment.

6. If you fail to provide personal data

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 criminal record 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.

7. How we use particularly sensitive personal data

We will use your particularly sensitive personal data in the following ways:

- We will use information about your health and disability status to consider whether we need to provide appropriate adjustments during the recruitment process, for example during a test or interview.
- We will use information about your race or national or ethnic origin, religious, philosophical or moral beliefs, or your sexual life or sexual orientation, to ensure meaningful equal opportunity monitoring and reporting. Data that the Company uses for these purposes will be collected on an anonymised basis. Candidates are entirely free to decide whether or not to provide such information and your application will not be affected either way.

8. Information about criminal convictions

We envisage that we will process information about criminal convictions for specific roles and activities. We will collect information about your criminal convictions history if we would like to offer you the work or role (conditional on checks and any other conditions, such as references, being satisfactory). We are required 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. In particular:

- We are legally required to carry out criminal record checks for those likely to be working or to come into contact with children;
- In the event the role for which you have applied requires a high degree of trust and integrity, with access to sensitive financial and other information, we may consider it appropriate to carry out such checks.

We have in place an appropriate policy document and safeguards which we are required by law to maintain when processing such data.

Less commonly, we may use information relating to criminal convictions where it is necessary in relation to legal claims, where it is necessary to protect your interests (or someone else's interests) and you are not capable of giving your consent, or where you have already made the information public.

We have in place an appropriate policy document and safeguards which we are required by law to maintain when processing such data. We will only collect information about criminal convictions if it is appropriate given the nature of the work.

9. Automated decision-making

You will not be subject to decisions that will have a significant impact on you based solely on automated decision-making.

10. Access to / Recipients of your personal data

We will disclose your personal data to members of our HR team and the relevant team managers in respect of the role you are applying for in order to take hiring decisions.

It may be necessary from time to time for us to disclose your personal data to third parties or agents, including without limitation to the following:

- third parties or agents of clients to assist in the administration, processing and management of certain activities pertaining to prospective employees including external reference agencies (such as employee vetting and screening agencies) and travel and expense management service providers;
- individuals or companies employed by the Company to carry out specific services, functions or consultancy work and other financial institutions;
- relatives or legal representatives of prospective employees;
- regulatory bodies to whom we are obliged or required to disclose information, government bodies and agencies or courts and court-appointed persons; and
- other support service providers necessary to support the organisation in the services listed.

Why might you share my personal data with third parties?

We will only share your personal data with the following third parties for the purposes of processing your application:

- search consultancy;
- other entity in the group.

All our third-party service providers and other entities in the group are required to take appropriate security measures to protect your personal data in line with our policies. We do not allow our third-party service providers to use your personal data for their own purposes. We only permit them to process your personal data for specified purposes and in accordance with our instructions.

11. Data security

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

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.

12. How long will you use my information for?

Successful applicants

If your application for employment or engagement is successful, personal data gathered during the recruitment process will be transferred to our HR management system and retained during your employment in accordance with our staff privacy and retention policies.

Unsuccessful applicants

If your application for employment or engagement is unsuccessful, we will hold your data on file for 6 months after the end of the relevant recruitment process to the extent necessary to enable the Company to comply with any legal obligations or for the exercise or defence of legal claims (subject to any applicable legal or regulatory obligations to retain such information for a longer period).

It is likely that we will wish to retain your data for a further period of 6 months on the basis that a further opportunity may arise in future and we may wish to consider you for that. If so, we will write to you separately, seeking your explicit consent to retain your personal data for a fixed period on that basis – you do not have to consent to this, and you can withdraw your consent at any time thereafter.

At the end of that period (or if you withdraw your consent prior to this) we will securely destroy your personal data in accordance with our data retention policy applicable laws and regulations.

In the event that any court actions or other legal proceedings are pending or impending, personal data will be deleted after termination of the court action or legal proceeding as appropriate.

13. Your rights in connection with personal data

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

- **Request access** to your personal data (commonly known as a "data subject access request"). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.
- **Request correction** of the personal data 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 data. This enables you to ask us to delete or remove personal data 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 data where you have exercised your right to object to processing (see below).
- **Object to processing** of your personal data 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 data for direct marketing purposes.
- **Request the restriction of processing** of your personal data. This enables you to ask us to suspend the processing of personal data about you, for example if you want us to establish its accuracy or the reason for processing it.
- **Request the transfer** of your personal data to another party.

If you want to review, verify, correct or request erasure of your personal data, object to the processing of your personal data, or request that we transfer a copy of your personal data to another party, please contact the HR team by email at this address recruitment@edeandravenscroft.com.

14. Candidate Responsibilities

You should use all reasonable endeavours to keep us informed of any changes to your personal and special personal data. If you become aware of a data breach or a potential data breach in respect of personal data please report the matter immediately to the Privacy Officer by email at privacy.officer@edeandravenscroft.com.

15. Privacy Officer

We have appointed a privacy officer to oversee compliance with this policy. If you have any questions about this policy or how we handle your personal data, please contact the Privacy Officer by email at privacy.officer@edeandravenscroft.com.

16. Complaints

You have the right to lodge a complaint with the UK's Information Commissioner's Office if you are unhappy with how your personal data is being handled.

17. Further Information

If you require any further clarification regarding this privacy notice, please contact the Company's Privacy Officer by email at privacy.officer@edeandravenscroft.com.