

Terms & Conditions

Job Applicant Privacy Notice

Introduction

Stannah is committed to protecting the privacy and security of your personal information.

This Applicant Privacy Notice sets out what personal data we hold about you and how we collect and use it, when you apply for a role within our business. in accordance with data protection law.

It is important that you read the Privacy Notice carefully, together with any other information that we might give you from time to time about how we collect and use your personal data.

Stannah is a "data controller". This means that we are responsible for deciding how we hold and use personal information about you. Stannah includes the following companies:

Stannah Ltd, a private limited company registered in England and Wales under company number 00686996. Our registered office is Watt Close, East Portway, Andover, Hampshire, SP10 3SD. Stannah is registered with the Information Commissioner's Officer as a data controller, under registration number Z5229073.

You are being sent a copy of this privacy notice because you are applying for work with us (whether as an employee, worker, volunteer, self employed consultant or contractor or as part of a student placement). 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.

In relation to contractors, temporary agency workers, consultants, apprentices, and those on student placements, references to 'employee', 'employer' and employment related activities should be construed as referring to the alternative arrangement those categories of people have with us. Personal data will only be collected where it is relevant to the contractual or other arrangements between Stannah and each individual or company. Nothing in this agreement shall affect the status of contractors, temporary agency workers, consultants, apprentices, and those on student placements or shall render them an employee, worker, agent or partner of Stannah.

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.

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 to us in your curriculum vitae and covering letter.
- The information you have provided on our application form, including name, title, address, telephone number, personal email address, employment history, qualifications, current salary, driving licence information, UK residence restrictions, requirement of a work permit.
- Any information you provide to us during an interview.
- Any other information you provide to us during the application process in any format, including any tender documents (where applicable).
- Results of any tests undertaken as part of the application process

We may also collect, store and use the following "special categories" of more sensitive personal information if voluntarily provided by you:

- Information about your race or ethnicity, religious beliefs, sexual orientation and political opinions.
- Information about your health, including any medical condition, health and sickness records.
- Information about criminal convictions and offences.

How is your personal information collected?

We may collect personal information about candidates from the following sources:

- You, the candidate, provide us with most of the personal data about you that we hold and use. .
- Internal sources: in some cases, existing employees can make recommendations about potential applicants. Such employees will add personal data about such potential applicants.
- Specific recruitment agencies, from which we collect the following categories of data: General contact information, qualifications,
- Your named referees, from whom we collect the following categories of data: dates of employment, reason for leaving, details of honesty, reliability, punctuality, team working, cooperation, standard of work, number of sick absence days, number of parental leave days taken and whether they would re-employ

- we may obtain information about you from publicly accessible sources such as your LinkedIn profile or other social media sources/HMRC

How we will use information about you

All applicants' personal data collected by the Company is collected in order to ensure that the Company can efficiently assess job applicants and conform with its equal opportunities' obligations. Personal data shall also be used by the Company in meeting any and all relevant obligations imposed by law.

The table below summarises how we will use the personal information we collect about you, and our purpose and legal basis for processing your personal data:

Personal data	Purpose Keeping Records for our hiring processes	Legal basis for processing
Biographical details (including name, title, contact details)	Communicate with you about the recruitment process	Legitimate Interest
Any information you provide to us in your CV and covering letter; qualifications (including educational, vocational and training); current salary; driving license information; images, and information in Chat	Assess your skills qualifications, and suitability for the role; determine whether you meet basic requirements for shortlisting and invitation to interview	
Information you provide during your interview; results of any tests undertaken as part of the application process	To decide whether to offer you the role	
Performance and career progression; references (dates of previous employment, reasons for leaving, details of honesty, reliability, punctuality, teamworking cooperation, standard of work)	If you are offered the role, to carry out background and reference checks to confirm your skills qualifications, job history and suitability for the role – final decision on whether or not to employ	
Recruitment information including correspondence, right to work checks and related documents	Where we need it to comply with a legal obligation, for example, to verify you are entitled to work in the country	Legal obligation

	in which you are to be employed.	
Additional legal grounds for processing special category or other sensitive data		
Medical information (disability status)	To consider whether we need to provide appropriate adjustments during the recruitment process – for example during a test or interview, or at any other stage in the process	Legal Obligation / Performance of a contract / Assessment of working capacity
Race, ethnicity, religious beliefs, sexual orientation or health	Where it is needed in the public interest, such as for equal opportunities monitoring and reporting	Legal Obligation / Public interest in monitoring equal opportunities within the workforce

Automated decision-making

You will not be subject to 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?

Where your application involves the use of a recruitment agency, we may pass information regarding the progress of your application, including feedback on your performance in the recruitment process, and the terms on which we are prepared to make a job offer, if applicable, to your recruitment agent.

All our third-party service providers and other entities in the group are provided with written instructions, are under a duty of confidentiality, and are obliged to implement appropriate technical and organisational measures to ensure the security of 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.

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. In no circumstances will your personal data be passed to any department or any individual within the Company or to a third party that does not reasonably require access to that personal data in view of the purpose(s) for which it was collected and is being processed.

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.

International Data Transfers

In limited instances, your personal data may be stored, processed and transferred outside the UK or EEA for processing. When transferring personal information outside the UK or EEA, we shall ensure that it is secure and transferred under contractual arrangements that offer the same level of protection as in the UK. We shall make sure that any transfers of your personal information from one country to another comply with those data protection and privacy laws which apply to us and:

- Ensure that the country in which your personal information will be handled has been deemed “adequate” by the government; or
- Include standard data protection contact clauses approved by the ICO for transferring personal information outside the UK within into our contracts with those third parties as required under the General Data Protection Regulation (UK and EU GDPR)); or have entered into such binding agreements that fully comply with the lawfulness of the third country transfers.

Data retention

How long will you use my information for?

Your personal data will only be kept for as long as is necessary and in accordance with our company retention and deletion policy. We only keep your personal information for as long as we need to, so that we can use it for the reasons described above.

To determine the appropriate retention period for personal data, we consider the amount, nature and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal, regulatory, tax, accounting or other requirement.

Where necessary, we shall keep your personal data for as long as required to do so by law; and where required to establish, exercise or defend our legal rights.

If your application is unsuccessful, we will usually retain your personal information for a period of 6 months after we have made the relevant appointment, subject to any additional legal obligations and in accordance with any legitimate interests of the company. 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, correction, erasure, and restriction

Your rights in connection with personal information

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

- Right to know: the right to be informed about what data we collect, the purposes for processing your data, how long we will keep it, and with whom it will be shared. This Privacy Policy has been designed to meet that right.
- Request access to your personal information (commonly known as a "data subject access request"). You have the right at any time to ask us (by making a subject access request) what personal information we hold about you, how we are using it, with whom we are sharing it, and where we obtained your personal data. You may also request a copy of the personal information.
- Request correction 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.
- Right to withdraw consent: Where our processing of your personal data is based on your consent, you have the right to withdraw that consent at any time.
- 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. You have the right to receive personal data which you have provided to us, in a structured, commonly used and machine-readable format, and the right to transmit that data to a third party in certain situations.

If you want to review, verify, correct or request erasure of your personal information, object to the processing of your personal data, have any questions about this privacy notice or the information we hold about you, or request that we transfer a copy of your personal information to another party, please contact the Chief HR in writing at grouphr@stannah.co.uk.

If you are not satisfied with our response or believe we are not processing your personal data in accordance with the law, you have the right to make a complaint to data protection regulator. To do so, please contact The Information Commissioner's Office (ICO)

The ICO is the UK's independent body set up to uphold your rights to data privacy. The ICO can be contacted at the following address:

The Office of the Information Commissioner, Wycliffe House, Water Lane, Wilmslow, Cheshire

SK9 5AF.

Tel: +44 (0) 01625 545 745

Website: www.ico.org.uk

Privacy Policy Updates

We have the right, at any time, to make changes or additions to the Privacy Policy. The latest version of this privacy policy will always be available on our website. This Privacy Policy is dated 25/01/2024.