



## Recruitment Privacy Notice

### SECTION 1 – DATA CONTROLLER

WITTENSTEIN high integrity systems Ltd are the Data Controller in relation to the Personal Data described in this notice and, acting as such, are committed to protecting your privacy and complying with UK Data Protection legislation.

### SECTION 2 – DATA ADMINISTRATORS

Transparency is of the greatest importance to us. If you have any questions about the personal data we hold or the WITTENSTEIN high integrity systems Ltd Privacy Notice, please contact one of the Data Administrators listed below.

Data Administrator:	Louise Boyce <a href="mailto:louise.boyce@wittenstein.co.uk">louise.boyce@wittenstein.co.uk</a> +44 1275 546 430
Deputy Data Administrator:	Joanna Hall <a href="mailto:joanna.hall@wittenstein.co.uk">joanna.hall@wittenstein.co.uk</a> +44 1275 395 619

#### Information the company collects

As part of our recruitment process, the company collects and processes personal data relating to candidates. This includes:

- your name, address and contact details, including email address and telephone number;
- details of your qualifications, skills, experience and employment history;
- whether or not you have a disability for which the company needs to make reasonable adjustments during the recruitment process; and
- information about your entitlement to work in the UK.

The company collects this information in a variety of ways. For example, data might be contained in CVs or resumes, obtained from your passport or other identity documents, or collected through interviews or other forms of assessment including psychometric tests. Recruitment agencies also regularly provide personal data, primarily in the form of candidate CVs.

The company may 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. The company will seek information from third parties only once a job offer to you has been made 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).

#### How will the company use information about you

We will use the personal information 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.

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

The company has a legitimate interest in processing personal data during the recruitment process and for keeping records of the process. Processing data from candidates allows the company to manage the recruitment process, assess and confirm a candidate's suitability for employment and decide to whom to offer a job. The company may also need to process data from candidates to respond to and defend against legal claims. We also need to process your data in order to enter into a contract with you.

In some cases, the company needs to process data to ensure that it is complying with its legal and regulatory obligations. For example, it is required to check a successful candidate's eligibility to work in the UK before employment starts.

The company processes health information if it needs to make reasonable adjustments to the recruitment process for candidates who have a disability. This is to carry out its obligations and exercise specific rights in relation to employment.

The company will not use your data for any purpose other than recruitment.

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

Your information will be shared internally for the purposes of the recruitment exercise. This includes members of the HR team, interviewers involved in the recruitment process, other recruitment decision-makers in the company and IT staff if access to the data is necessary for the performance of their roles.

The company will not share your data with third parties, unless your application for employment is successful and it makes you an offer of employment. The company may then share your data with former employers to obtain references for you, employment background check providers and (where required) regulatory bodies to obtain necessary background checks.

The company takes the security of your data seriously and will not transfer your data outside the European Economic Area. We have 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.

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

If your application is unsuccessful, we may keep your personal data on file for up to 12 months in case there are future employment opportunities for which you may be suited. At the end of that period, or if you withdraw your consent to retain the information during the period, your data is deleted or destroyed.

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.

## **SECTION 4 – INDIVIDUAL RIGHTS UNDER GDPR**

### **Information, rectification, erasure, restriction of processing, data portability and withdrawal of consent**

You have the right to request information regarding Personal Data stored by us about you at any time and at no cost, in particular about the origin and recipients of your data as well as the purpose for which it has been processed. In addition, you also have the right to demand the rectification,



erasure, restriction of processing and portability of such data to the extent permitted by law. If you have given us your consent to collect and store data about you, you have the right to withdraw your consent to the storage of such data at any time. The withdrawal of consent does not affect the lawfulness of collection and storage based on consent before its withdrawal. We reserve the right to request and retain Personal Data if it is essential to meet the obligations laid out in the contract of employment.

### **Right to lodge a complaint**

If you have any concerns regarding the handling of your Personal Data we request that, in the first instance, you raise these internally by contacting one of the Data Administrators listed at the top of this document. If you are not satisfied with the outcome, every Data Subject has the right to lodge a complaint with the supervisory authority if they consider that the processing of Personal Data relating to them is unlawful. The responsible supervisory authority with regard to data protection issues is the ICO: <https://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, we may not be able to process your application properly or at all.

### **Automated decision-making**

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