



## PRIVACY NOTICE FOR JOB APPLICANTS

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This privacy notice tells you what personal data we process about you in the context of a job application process for a role at our Company. It explains which personal data is processed, on which basis, why they are processed and which rights you have.

### **1 Who will process my personal data?**

Under the law, if we hold personal data about you and use it, this means we process that data. As part of your job application, your personal data will be processed by the company you have applied at ('Company').

In practice, this means that your personal data will be processed by the Company's Human Resources department.

### **2 What is the purpose for the processing of my personal data?**

Some of your personal data is information we need about you in order to process your job application, such as your qualifications and employment history.

With your explicit consent, this data will also be processed in order to contact you for possible future vacancies within our Company.

We may also need other personal data about you such as a photographic ID or licence plate details for normal security checks and access requirements for people entering our sites or buildings.

### **3 What is the lawful basis for the processing of my personal data?**

Your personal data will be processed on the basis of the following legal grounds:

- In view of entering into and performance of the employment contract, including personnel and payroll policy;
- To comply with legal obligations applicable to the Company;
- In the context of the legitimate interests of the Company and / or a third party such as
  - network security and information systems security,
  - security of data of employees, customers and suppliers,
  - visitor registration,
  - property security,
  - prevention of fraud,
  - dealing with legal claims made against us,
  - conducting personnel administration and personnel management,
  - transfer of personal data to any relevant companies within our groups of companies for internal administrative purposes;
- Consent.

We require you to provide us with your personal data for legitimate purposes as part of the job application process and, if you are successful, to be employed by the Company. You are not obliged to provide this information. However, if you do not provide personal information as requested, the application process cannot be completed and you will not be eligible for recruitment.



#### **4 Which categories of personal data will be processed?**

The personal data that we will collect as part of the recruitment process include, in accordance with applicable legal requirements that can differ in each country:

- Identification data such as name, title, date of birth, gender
- Contact details such as addresses, telephone numbers and personal email addresses
- Marital status and dependants if you have provided this information
- National (Insurance) numbers
- Number/copy of driving licence
- Behavioural and personal characteristics through records of interviews and other assessments as part of the application process
- Any aptitude tests you take as part of the application process
- Training and professional data
- Other Recruitment information (including copies of right to work documentation, references and other information included in a CV or cover letter and/or as part of the application process)
- Employment records (including job titles, work history, working hours, holidays, training records and professional memberships)
- CCTV footage and other information obtained through electronic means
- Photographs if you have provided them
- Passport photo or other details for access to the Company only used to give access
- Results of public administration checks such as employment status check or other legally required checks
- Details of your interest in and connection with the intermediary through which your services are supplied like a recruitment agency
- Background checks relating to criminal records where there is legal obligation to obtain these
- Background information that is obtained from internet search and public profiles website only in those cases where we have a legitimate interest and in accordance with applicable legal requirements
- License plate details
- References of former employers
- Medical reports where these are required as part of the application process
- Information about disability, your race or ethnicity, religious beliefs, sexual orientation and political opinions if the Company you apply at has a written policy requiring this information and/or according to what is included in the equal opportunities monitoring or any other approved form.

#### **5 Where do your personal data come from?**

Most personal data is provided to the Company by you or your employment agency. In some cases we will obtain information about you from/via third parties, such as a reference from a current or former employer or a platform like LinkedIn. We will only obtain third parties' information in accordance with applicable legal requirements. Please note that third parties have different privacy policies.

#### **6 Who will have access to my personal data?**

Your personal data will be processed by the Company's Human Resources department. Your personal data will be accessed by or communicated to your future managers and other people in the Company who have a role in the recruitment process. In some cases your data may be shared with other related companies if this is necessary as part of the recruitment process.



Where required, some of your personal data may also be passed to the Company's Security department and third parties including the Company's security providers.

Anyone who processes or accesses your personal data must respect the confidentiality of your data and may only process or access it in accordance with the instructions of the Company.

## **7 Will my personal data be transferred outside my country of residence?**

Your data will not be transferred without adequate safeguards in place, for example outside of the European Union/European Economic Area.

## **8 Will the Company use automated decision-making?**

Automated decision-making is defined as decisions about individuals that are based solely on the basis of automated data processing and that have legal consequences or that affect the individuals involved to a considerable extent.

As a principle, the Company foresees not to use automated decision-making as described above.

## **9 How long will my personal data be kept?**

If your application is not successful and you have not given your consent for us to keep your data so we can contact you about future suitable job vacancies, we will not keep your data after the recruitment exercise ends unless where we are required by law or have lawful grounds to keep certain personal data. If we keep such data, we will do so only in accordance with applicable legal requirements.

If your application is not successful but you would like us to contact you in future about any further opportunities you will need to give us your explicit consent to keep your data for this purpose.

If you are recruited, your personal data will be retained in accordance with the Company's data retention policies for employees.

## **10 What rights do I have about my personal data that the Company hold?**

You can request access to the data at any time or you can submit an access request. You can also ask the Company's Human Resources department to correct, delete, limit or transfer the data.

The processing of your data by the Company before erasure is not unlawful.

If you want to make an access request or make an enquiry about your data you can do so by contacting the person named in the job vacancy or by writing to the Company's human resources department.

For general requests on the privacy of the Company, you can contact the Company's privacy department via: [gdpr@cldn.com](mailto:gdpr@cldn.com).

If you wish to make a complaint about the processing of your data you can also contact the competent supervisory authority.