

## Job Applicant Privacy Notice

**Data controller:** MiCiM Ltd

**Data protection officer:** Company HR Manager

### Introduction

As part of our recruitment process, MiCiM Ltd (the “Company”) collects and processes personal data relating to job applicants. We are committed to protecting the privacy and security of your personal data. This privacy notice sets out how we collect and use that data and how we meet our data protection obligations.

### What information does the Company Collect?

The Company collects and processes the following categories of information about you:

- Personal contact details such as your name, title, home address, personal email address and contact telephone numbers (as provided on your CV or application form)
- Details of your qualifications, skills, experience and employment history and other information included in a CV or cover letter or as part of the application process, including start and end dates with previous employers and references
- Information about your current level of remuneration, including benefit entitlements
- CCTV footage, if you have attended the Company’s premises for an interview; and
- Information about your entitlement to work in the UK or internationally, if this information has been provided during the interview and selection process.

We may also collect and process the following “special categories” of more sensitive personal data:

- Whether or not you have a disability for which the Company needs to make reasonable adjustments during the recruitment process.

### How will the Company Collect this Personal Data?

The Company collects this information in a variety of ways: from correspondence with you; from information contained in your application form, CV and any cover letter; obtained from your passport or other identity documents; or collected through interviews, meetings or other forms of assessment; and other information provided directly by you.

Internet searches may be used by the Company as part of due diligence processes on candidates in the course of recruitment and selection. Social media platforms, which may include Facebook, Twitter, LinkedIn and Instagram may be viewed for these purposes.

The Company may also collect personal data about you from third parties, such as references supplied by former employers, information from employment agencies,

information from employment background check providers and from the Disclosure and Barring Service. 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. Where necessary the Company will also ask for your consent.

### **Where Will Personal Data be Stored?**

Data will be stored in your application record, in the Company's HR management systems and on other IT systems (including the Company's email system).

### **Why does the Company Process Personal Data?**

The Company needs to process data prior to entering into a contract with you in order to run an effective recruitment process. It may also need to process your data to enter into an employment contract with you.

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

The Company has a legitimate interest in processing personal data during the recruitment process and for keeping records of the process. Processing data from job applicants allows the Company to manage an effective recruitment process, assess and confirm a candidate's suitability for employment and decide who to offer a job to. If you are successful, the Company will also need to process your personal data in order to decide the terms on which it will enter into an employment contract with you. The Company may also need to process data from job applicants to respond to, defend against and otherwise deal with legal disputes involving you or other job applicants, our employees, workers or contractors.

The Company will process the "special categories" of data listed above in the following circumstances:

- Where we need to carry out our legal obligations or exercise rights in relation to your application and/or
- In limited circumstances where it is needed in relation to legal claims

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

We will use the "special categories" of personal data in the following ways:

- We will use information about your physical or mental health, or disability status, to ensure your health and safety and to provide appropriate adjustments during the application process

For all roles, the Company is obliged to seek information about criminal convictions and offences. Where the Company seeks this information, it does so because it is necessary for it to carry out its obligations and exercise specific rights in relation to employment. We have in place an appropriate policy document and safeguards which we are required by law to maintain when processing such data.

If your application is unsuccessful, the Company may keep your personal data on file in case there are future employment opportunities for which you may be suited. The Company will retain your data for six months, although the Company can erase your data at your request if you notify [GDPR@micimgroup.com](mailto:GDPR@micimgroup.com)

### **Who has Access to Data?**

Your information may be shared internally for the purposes of the recruitment exercise. This includes interviewers and others involved in managing the recruitment process, managers in the business area with a vacancy 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 will then share your data with third parties in order to contact former employers to obtain references for you, obtain employment background checks from third party providers and to obtain necessary DBS checks from the Disclosure and Barring Service (DBS) via an umbrella body, to provide information required by a regulator or to otherwise comply with the law or where we have another legitimate interest in doing so.

The Company will not transfer your personal data to countries outside the European Economic Area, unless you will be working on an international project for us, and it is a requirement to share your details with the client, if client approval is required as part of the recruitment process.

### **Automated decision-making**

Recruitment processes are not based solely on automated decision-making, examples of which may include online recruitment and selection testing.

### **How does the Company protect data?**

The Company takes the security of your data seriously. It has internal policies and controls in place to prevent your data from being lost, accidentally destroyed, misused or disclosed, and to ensure it is not accessed except by the Company's employees and other staff in the proper performance of their duties. The Company's IT infrastructure is protected by anti-virus software, firewalls and data encryption. Staff have restricted access to the data held by the Company and only have access to the data that they are required to see. All access is password protected for each individual account. Those who have access to your data will primarily be the recruiting manager, HR department and any other manager involved in the recruitment process.

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.

## **For How Long does the Company Keep Data?**

If your application for employment is unsuccessful, the Company will hold your data on file for six months after the end of the relevant recruitment process for the purposes of satisfying any legal, accounting, or reporting requirements and for consideration for future employment opportunities. At the end of that 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 HR file and on our HR information management system Employment Hero and retained during your employment. The periods for which your data will be held will be provided to you in a privacy notice.

In some circumstances we may anonymise your personal information so that it can no longer be associated with you, in which case we may use such information without further notice to you.

## **Your rights**

As a data subject, you have several rights. You can:

- Access and obtain a copy of the personal data we hold about you on request
- Require the Company to correct inaccurate or incomplete personal data
- Require the Company to delete or stop processing your personal data where there is no good reason for us continuing to process it or where you have exercised your right to object to processing (See below)
- Object to the processing of your personal data where the Company is relying on its legitimate interests (or those of a third party) as the legal ground for processing
- Request the restriction of processing of your personal data. This enables you to ask us to suspend the processing of your personal data, for example if you want us to establish its accuracy or the reason for processing it

If you would like to exercise any of these rights, please contact [GDPR@micimgroup.com](mailto:GDPR@micimgroup.com)

If you believe that the Company has not complied with your data protection rights, you have the right to complain at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues.

It is important that the personal information we hold about you is accurate and current. Please inform [GDPR@micimgroup.com](mailto:GDPR@micimgroup.com) if your personal information changes during the application process.

You will not normally have to pay a fee to access your personal information or to exercise any of the other rights. However, we may charge a reasonable fee if your request for access is clearly unfounded or excessive. Alternatively, we may refuse to comply with the request in such circumstances.

In the limited circumstances where your personal data is processed based on your consent for a specific purpose, you have the right to withdraw your consent for that specific processing at any time. To withdraw your consent please contact [GDPR@micimgroup.com](mailto:GDPR@micimgroup.com) Once we have received notification that you have withdrawn your consent we will no longer

process your information for the purpose or purposes you originally agreed to, unless we have another legitimate basis for doing so in law.

### **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, the Company may not be able to process your application properly or at all.

If you have any questions about this privacy notice or how we handle your personal information, please contact [GDPR@micimgroup.com](mailto:GDPR@micimgroup.com)

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**Kerry Etherton**

Head of HR (EMEA)

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