

CANDIDATE PRIVACY NOTICE

COMPASS GROUP, UK AND IRELAND LIMITED

What is the purpose of this document?

This is a privacy notice issued by Compass Group, UK & Ireland Limited, a company incorporated in England & Wales under number 02272248 whose registered office is at Parklands Court, 24 Parklands, Birmingham Great Park, Rubery, Birmingham B45 9PZ and which covers the data protection obligations of itself and all its subsidiary companies (referred to in this document as "Compass").

Compass is committed to protecting the privacy and security of any personal information it might obtain about you and this privacy notice describes how Compass collects and uses personal information about you in accordance with the General Data Protection Regulation (GDPR).

For the purposes of the GDPR, Compass is a "data controller". This means that we are responsible for deciding how we hold and use personal information about you. We are required under data protection legislation to notify you of the information contained in this privacy notice.

This notice does not form part of any employment contract we might ultimately have with you but it is important that you read and retain this notice so that you are aware of how and why we are using such information and what your rights are under the data protection legislation.

You are being provided with a copy of this privacy notice because you are applying for work with us (whether as an employee, worker or contractor and whether on a permanent, part-time or casual basis) and it makes you aware of how and why your personal data will be used for the purposes of that recruitment exercise, and for how long it will usually be retained.

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, as applicable:

- The information you have provided to us in your curriculum vitae and covering letter.
- Professional or trade qualifications that are relevant to the industry and/or role for which you are applying.
- The information you have provided on any application form (whether hard copy or online), including name, title, address, telephone number, personal email address, date of birth, gender, employment history, industry / professional certification and academic qualifications.
- Information necessary for Right To Work purposes, including a passport

- Any information you provide to us during an interview (whether face-to-face, by phone or skype or in any other way).

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

- 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.
- Credit reference agency checks.

This sort of special category information is required if the role you are applying for demands it or if the role is on a client site where the client has obliged us to vet potential staff to this extent (for example; clients in the finance industry or in the defence sector are very strict about security, clients in the education and health sectors are very strict about criminal convictions because they have statutory "safeguarding" obligations to meet and to which our own staff must adhere). These sorts of information might not seem to be appropriate to the nature of the role you are applying for but we might still have to obtain it from you for reasons such as the above.

How is your personal information collected?

We collect personal information about candidates from the following sources:

- You, the candidate.
- Any recruitment agency through which you might be recommended and who might have produced a CV or other document for you.
- Sanctions and Watch Lists issued by governments, financial market regulators and law enforcement bodies form across the world.
- Outstanding County Court Judgments (CCJs), IVAs, Bankruptcies, alias names and address history using the electoral register.
- The Disclosure and Barring Service and Disclosure Scotland in respect of criminal convictions.
- The Home Office Employers Checking Service in respect of Right To Work in the UK
- Your named referees.

How we will use information about you

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

- Assess your skills, qualifications, and suitability for the work generally or the role specifically.
- Carry out background and reference checks, where applicable.
- Communicate with you about the recruitment process.
- Keep records related to our hiring processes.
- Comply with legal or regulatory requirements.

It is in our legitimate interests to decide whether to appoint you to the role since it would be beneficial to our business to appoint someone to that role and, if we do, we would need to process your personal information to decide whether to enter into a contract of employment with you.

Having received initial application paperwork, we will process the personal data within it to decide whether to shortlist you for the role. If you are shortlisted, we might use further personal data provided by you or obtained by us as part of the decision whether to invite you for an interview. If we interview you, we will use any information you provide to us at the interview as part of the decision whether to offer you the role. If we do decide to offer you the role, we will then need to take up references and potentially undertake further research about you such as Right To Work documentation, a DBS or Credit search before confirming your appointment.

If you fail to provide personal information

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 credit 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.

How we use particularly sensitive personal information

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

- We will use information about your disability status to consider whether we need to provide appropriate adjustments during the recruitment process, for example whether adjustments need to be made during any aptitude 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.

Information about criminal convictions

We will collect information about your criminal convictions history if we would like to offer you a role where such checks are required (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 history which makes you unsuitable for the role. In particular:

- We are legally required to carry out criminal record checks for those carrying out any role where their activities would bring them into contact with children or vulnerable adults.
- The role is one which is listed on the Rehabilitation of Offenders Act 1974 (Exceptions) Order 1975 (*SI 1975/1023*) and is also specified in the Police Act 1997 (Criminal Records) Regulations (*SI 2002/233*) so is eligible for a check (either Standard or Enhanced, as necessary) from the Disclosure and Barring Service.
- The role will involve your attendance at a client which is itself closely regulated as to the vetting of all staff and sub-contractor staff who have access to its sites where a Basic disclosure of your criminal records history might be necessary.

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

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?

We will not ordinarily share your personal information with any third parties for the purposes of processing your application. However, should we share your data, for any reason strictly necessary for the purposes of your application, we will ensure that any third-party service providers are required to take appropriate security measures to protect your personal information in line with our own policies and best practice in data management. 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.

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.

Data retention

How long will you use my information for?

We will retain your personal information for a period of 6 months after we have communicated to you our decision about whether to appoint you to role.

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 our data retention policy.

If we wish to retain your personal information on file, on the basis that a further opportunity may arise in future and we may wish to consider you for that, we will write to you separately, seeking your explicit consent to retain your personal information for a fixed period on that basis.

Rights of access, correction, erasure, and restriction

Your rights in connection with personal information

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

- **Request access** to your personal information (commonly known as a "data subject access request"). This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it.
- **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.
- **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.

If you want to review, verify, correct or request erasure of your personal information, object to the processing of your personal data, or request that we transfer a copy of your personal information to another party, please raise this with the Compass employee managing your application or by contacting our DPO.

Right to withdraw consent

If, at any time, we have specifically sought your Consent to process your personal information for the purposes of the recruitment exercise, you have the right to withdraw your consent for processing for that purpose at any time. To withdraw your consent, please raise this with the Compass employee managing your application or by contacting our DPO. Once we have received notification that you have withdrawn your consent, we will no longer process your application and, subject to our retention policy, we will dispose of your personal data securely.

Data protection officer

We have appointed a data protection officer (“DPO”) to oversee compliance with this privacy notice. If you have any questions about this privacy notice or how we handle your personal information, please contact the DPO whose details you can obtain from our website or from the Compass employee managing your application. You have the right to make a complaint at any time to the Information Commissioner’s Office (ICO), the UK supervisory authority for data protection issues.

Compass Group, UK & Ireland Limited
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