



RECRUITMENT PRIVACY POLICY

Introduction

It is the strategic policy of SWEEEP Kuusakoski Ltd to ensure that personal data obtained is only used for its intended purpose, to enable the Company to provide a first class service for the processing of waste electrical and electronic equipment such that the maximum recycling potential is realised, and to maintain and continually improve the satisfaction of our customers.

At SWEEEP Kuusakoski Ltd, we collect and process information about individuals (i.e. 'personal data') for business purposes, including employment and HR administration, provision of our services, marketing, and business administration. This includes personal data relating to our staff, customers, suppliers and other third parties.

Compliance with data protection law is essential to ensure that personal data remains safe, our business operations are secure and the rights of individuals are respected. This Policy explains our compliance with data protection law in relation to the privacy of personal data.

We are committed to preserving the privacy of applicants to our Company for employment. Our privacy policy details the information we collect, how we will use it and how we will protect the information that you provide.

Who does this Policy apply to?

This policy applies to applicants for employment at SWEEEP Kuusakoski Ltd and covers data held during and after the recruitment process. It applies to anyone who is applying to work for us, whether as an employee, worker, contractor, consultant, volunteer, partner or director.

Please note that we will not necessarily hold, use or share all of the types of personal data described in this Recruitment Privacy Policy in relation to you. The specific types of data about you that we will hold, use and share will depend on the role for which you are applying, the nature of the recruitment process, how far you progress in the recruitment process and your individual circumstances.

We are required by data protection law to give you the information in this Recruitment Privacy Policy. Should your application be successful, when you start work for us, we will provide you with the Company Data Protection Policy that explains how we deal with your personal data whilst you are working for us.

How is information collected?

At the initial stages of recruitment, we collect, hold and use the following types of general and special category(*) personal data about you:

- Information contained in your application form/CV/covering letter, including your name, title, contact details, employment history, experience, skills, qualifications/training, criminal convictions*, referees' names and contact details.
- Publicly available information about you, such as your social media presence
- Selection information, including correspondence, interview notes, internal notes, the results of any written or online selection tests

If you are shortlisted for a position, or you receive a conditional offer of employment, we may collect, hold and use the following additional types of personal data about you:

- Pre-employment check information, including references and verification of qualifications
- Right to work checks and related documents
- Health information for assessment for suitability for the role you are applying for*

We hold and use this personal data so that we can:

- process your application and correspond with you about it;
- assess whether you have the required skills, experience, qualifications, training and state of health for a role within the company;
- make informed recruitment decisions;
- verify information provided by you;
- check and demonstrate that you have the legal right to work in the UK;
- keep appropriate records of our recruitment process and decisions;

What are our legal grounds for using your personal data?

Data protection law specifies the legal grounds on which we can hold and use personal data. We rely on one or more of the following legal grounds when we process your general personal data:

- We need it to take steps at your request in order to enter into a contract with you (entry into a contract), because by applying for a job with us you are effectively asking us to enter into a contract with you, whether this is an employment contract, a contract for services or another type of contract.
- We need it to comply with a legal obligation (legal obligation), e.g. the obligation not to discriminate during our recruitment process, or the obligation not to employ someone who does not have the legal right to work in the UK.
- It is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests (legitimate interest). For example, it is in our legitimate interests to review and consider your personal data (as listed above) so that we can select the most appropriate candidate for the job.

The additional legal grounds that we rely on to collect, hold and use your special category data are explained below for each type of special category data.

At the initial stages of recruitment, we collect, hold and use the following special category data about you:

Disability/medical conditions:

Information relevant to any request by you for adjustments to the recruitment process as a result of an underlying medical condition or disability. We use this information to enable us to carry out a fair, non-discriminatory recruitment process by considering/making reasonable adjustments to our process as appropriate. Our additional legal ground for using this information is that we need it to comply with a legal obligation/exercise a legal right in relation to employment – namely, the obligations not to discriminate, and to make reasonable adjustments to accommodate a disability – and such use is in line with our Data Protection Policy.

Criminal records information - Convictions not spent under the Rehabilitation of Offenders Act (only):

We may request this information and use this information to assess your suitability for the role.

If you are shortlisted for a position, or you receive a conditional offer of employment, we may collect, hold and use the following additional types of special category personal data about you:

Pre-employment health questionnaires/medicals:

We collect information about your health in a pre-employment medical questionnaire and/or examination, as well as any information about underlying medical conditions and adjustments that you have brought to our attention. We use this information to assess whether you are fit to do the job with adjustments, to consider/arrange suitable adjustments and to comply with health and safety requirements. Our additional legal grounds for using this information are that: we need it to comply with a legal obligation/exercise a legal right in relation to employment – namely, the obligation to make reasonable adjustments to accommodate a disability – and such use is in line with our Data Protection Policy; and it is needed to assess your working capacity on health grounds, subject to appropriate confidentiality safeguards.

How do we collect your personal data?

You provide us with most of the personal data about you that we hold and use, for example in your written application, by completing any assessments and during any interviews. Some of the personal data we hold and use about you is generated from internal sources during the recruitment process. For example, the person interviewing you may score your suitability for the role and we record the reasons for decisions made about whether or not your application is successful.

Some of the personal data about you that we hold and use may come from external sources. For example, a recruitment agency provides us with a shortlist of candidates. If we offer you a role, we will carry out pre-employment checks, such as taking up references from past employers or education providers. If required we may ask a successful candidate to undergo a medical with an occupational health professional to report to us on your fitness to do the job. In some circumstances, we may ask the Home Office for information about your immigration status to verify your right to work in the UK. For some roles, we may also obtain information about you from publicly available sources, such as your LinkedIn profile or other media sources.

Who do we share your personal data with?

Recruitment agencies:

We engage recruitment agencies to provide us with the details of suitable candidates for our available vacancies, to communicate with those candidates, and to handle administration in connection with the recruitment process. If we have received your initial application details from a recruitment agency, we will share with them any of your personal data that is necessary to enable them to fulfil their functions for us. Our legal grounds for doing so are that: it is necessary for entry into a contract; and it is in our legitimate interest to engage service providers to assist us with the recruitment process.

Medical/occupational health professionals:

We may share information relevant to any request by you for adjustments to the recruitment process as a result of an underlying medical condition or disability with medical/occupational health professionals to enable us to identify what, if any, adjustments are needed in the recruitment process and, if you are successful, once you start work. We may also share details of disclosed medical conditions and/or answers to pre-employment health questionnaires with medical/occupational health professionals to seek a medical report about you to enable us to assess your fitness for the job and whether any adjustments are needed once you start work. This information may also be used by the medical/occupational health professionals to carry out assessments required by health and safety legislation. Our legal grounds for sharing this personal data are that: it is necessary for entry into a contract; it is in our legitimate interests to consider adjustments to enable Job Applicants to participate fully in the recruitment process and it is necessary to comply with our legal obligations/exercise legal rights in the field of employment.

Legal/professional advisers:

We share any of your personal data that is relevant, where appropriate, with our legal and other professional advisers, in order to obtain legal or other professional advice about matters related to you or in the course of dealing with legal disputes with you or other Job Applicants. Our legal grounds for sharing this personal data are that: it is in our legitimate interests to seek advice to clarify our rights/obligations and appropriately defend ourselves from potential claims; it is necessary to comply with our legal obligations/exercise legal rights in the field of employment; and it is necessary to establish, exercise or defend legal claims.

Home Office:

We may share your right to work documentation with the Home Office, where necessary, to enable us to verify your right to work in the UK. Our legal ground for sharing this personal data is to comply with our legal obligation not to employ someone who does not have the right to work in the UK.

What are the consequences of you not providing personal data?

We only ask you to provide personal data that we need to enable us to make a decision about whether or not to offer you a role. If you do not provide particular information to us, then we will have to make a decision on whether or not to offer you a role without that information, which in some cases could result

in us deciding not to recruit you. For example, if we ask you to provide an example of previous written work/a certificate verifying a qualification and you do not, we will have to decide whether to recruit you without that information. If you do not provide us with names of referees or a reference when asked, we will not usually be able to offer you the role. In addition, some of the personal data you provide to us is required by law. For example, if you do not provide us with the documentation we need to check your right to work in the UK, then we cannot by law employ you.

If you choose not to provide us with personal data requested, we will tell you about the implications of any such decision at the relevant time.

How long will we keep your personal data?

We will keep your personal data throughout the recruitment process. If your application is successful, when you start work for us you will be issued with a Data Protection Policy which outlines how your personal data is used during your employment with us.

If you are unsuccessful at gaining an interview your personal data will be destroyed once you have been informed. If your application is unsuccessful after interview, we will keep your personal data for 6 months from the date we notify you of our decision for the ability to address any future legal claims

If during the period that we have your personal data on file, you wish to apply for any other particular vacancy that we have open, please do contact us to make us aware of this – particularly if it is not a close match with your previous experience or is in a different area of our business from a vacancy you applied for previously.

In all cases, we will not keep your personal data for longer than we need it for our legitimate purposes.

Data Protection and References

If you give us details of referees, we require you to inform them what personal data of theirs you are giving to us. You must also give them our contact details and let them know that they should contact us if they have any queries about how we will use their personal data.

Solely automated decision-making

Profiling, or automated decision-making, occurs where an individual's personal data is processed and evaluated by automated means resulting in an important decision being taken in relation to that individual. This poses particular risks for individuals where a decision is based solely on that profiling or other automated processing. We do not generally conduct profiling or other automated decision-making in respect of personal data during the recruitment process. If you complete tests with a recruitment agency you have the right to enquire how test results are gathered, to request your results and query the process as you deem necessary.

What are your rights?

You have a number of legal rights relating to your personal data, which are outlined here:

- **The right to make a subject access request.** This enables you to receive certain information about how we use your data, as well as to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.
- **The right to request that we correct incomplete or inaccurate** personal data that we hold about you.
- **The right to request that we delete or remove** personal data that we hold about you 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 data where you have exercised your right to object to processing (see below).
- **The right to object to our processing** your personal data where we are relying on our legitimate interest (or those of a third party), where we cannot show a compelling reason to continue the processing
- **The right to request that we restrict our processing** of your personal data. This enables you to ask us to suspend the processing of personal data about you, for example if you want us to establish its accuracy or the reason for processing it.
- **The right to withdraw your consent to us using your personal data.** As described above, we do not normally rely on your consent as the legal ground for using your personal data. However, if we *are* relying on your consent as the legal ground for using any of your personal data and you withdraw your consent, you also have the right to request that we delete or remove that data, if we do not have another good reason to continue using it.
- **The right to request that we transfer** your personal data to another party, in respect of data that you have provided where our legal ground for using the data is that it is necessary for the performance of a contract or that you have consented to us using it (this is known as the right to “data portability”).
- **The right to object to a decision** based on profiling/solely automated decision-making, including the right to voice your opinion, and obtain human intervention in the decision-making.

GENERAL

If you are in any concerns or questions about how your personal data is being used by us or would like to exercise any of the above rights or wish to register a suspected breach of this Policy, you should contact us emailing to Dataprotection@sweep.co.uk.