

APPLICANT PRIVACY NOTICE

The Sovini Group is committed to protecting the privacy and security of your personal information.

This privacy notice describes how we collect and use personal information about you when you are applying for work with us (whether as an employee, worker, contractor or in order to gain work experience on a work placement), in accordance with data protection legislation.

This privacy policy is provided in a layered format so you can click through to the specific areas set out below. Alternatively, you can download a pdf version of the policy here: [\[PDF\]](#).

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What is the purpose of this document?

The Sovini Group consists of a number of different legal entities which includes Sovini Limited and a number of Group Members. Further information about our Group

Members can be found here: <https://sovini.co.uk/our-group-members>. For simplicity throughout this notice, 'we' and 'us' means the Sovini Group.

You can apply for a position at any of the entities in the Sovini Group using the portal on the Sovini Group website. This notice sets out how your personal data will be used by us when you are applying for work with us (whether as an employee, worker, contractor or in order to gain work experience on a work placement).

The company in the Sovini Group that you are applying to work with within the Sovini Group is a "data controller". The Sovini Group are responsible for deciding how we hold and use personal information about you.

It is important that you read and retain this notice, together with any other privacy notice we may provide on specific occasions when we are collecting or processing personal information about you, so that you are aware of how and why we are using such information and what your rights are under the data protection legislation.

If you are successful in your application we will require additional information from you in order for your role to with us to begin and at that stage we will set out how we will treat that information.

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Data protection principles

We will comply with data protection law, which say that the personal information we hold about you must 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.

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The kind of information we hold about you and how we use it

Personal data or personal information means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

There are certain types of more sensitive personal data which require a higher level of protection such as information about a person's health or sexual orientation. Information about criminal convictions also warrants this higher level of protection.

In connection with your application for work with us, we will collect, store, and use the following categories of personal information about you:

- The information you have provided on our application form, including name, title, address, telephone number, personal email address, date of birth, gender, marital status, employment history, qualifications, referees, whether you have ever served in the armed forces, whether you hold a driving licence, your eligibility to work in the UK, relationships with members of staff or board members.
- The information you have provided to us in your curriculum vitae and covering letter.
- Any information you provide to us during an interview.

We may also collect, store and use the following types of more sensitive personal information for equal opportunity purposes:

- Information about your race or ethnicity, your nationality or sexual orientation.
- Information about your health, including any disability and details of disability.

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How is your personal information collected?

We collect personal information about applicants through the application and recruitment process, either directly from you using on our online portal or sometimes directly from you via other means such as email. We may also collect personal information about candidates from referees during the recruitment process.

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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 or role.

- Carry out 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 engage you in relation to the particular role since it would be beneficial to our business to appoint someone to that role or engage someone in relation to the work.

We also need to process and use your personal information to decide whether to enter into a contract of employment with you.

The information we ask for is used to assess your suitability for employment. You don't have to provide what we ask for but it may affect your application if you don't.

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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.
- We will use information about your race or national or ethnic origin, or your sexual life or sexual orientation, to ensure meaningful equal opportunity monitoring and reporting.

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Automated decision-making

You will not be subject to decisions that will have a significant impact on you based solely on automated decision-making, unless we have a lawful basis for doing so and we have notified you.

We do not envisage that any decisions will be taken about you using automated means, however we will notify you in writing if this position changes.

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Data sharing

In order to process your application or request for work with a particular entity within the Sovini Group we may share your data between appropriate entities within the Sovini Group.

On occasion we may also have to share your data with third parties, including third-party service providers, for example third parties who are providing software solutions to us. We will only share your personal information with the third parties for the purposes of processing your application.

All our third-party service providers and other entities in the group are required to take appropriate security measures to protect your personal information in line with our policies. 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.

We will share your personal information with third parties where required by law to do so, for example equality and diversity monitoring.

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International transfers

The Sovini Group may occasionally process your personal information overseas this will be for the storage of data in systems that are cloud based, cloud adoption is now around 90 % in the UK.

When processing data in this way The Sovini Group have to ensure that cloud services are compliant and that systems and applications are adhering to current United Kingdom General Data Protection Regulation (UK GDPR) and Data Protection Act 2018.

We will not share your information with countries or organisations who are outside of the European Economic Area (EEA) unless to a country or an international organisation that has an appropriate “adequacy decision”; such countries include: Andorra, Argentina,

Canada, the Faroe Islands, Guernsey, Israel, the Isle of Man, Japan, Jersey, New Zealand, Switzerland and Uruguay. Transfers are also allowed where “appropriate safeguards” have been put in.

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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.

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Data retention

We will retain your personal information for a year after we have communicated to you our decision about whether to appoint you to the 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 applicable laws and regulations.

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Rights of access, correction, erasure, and restriction

Your duty to inform us of changes

It is important that the personal information we hold about you is accurate and current. Please keep us informed if your personal information changes during the recruitment process with us.

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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.

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 contact Stephen Reilly in writing.

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No fee usually required

You will not 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.

What we may need from you

We may need to request specific information from you to help us confirm your identity and ensure your right to access the information (or to exercise any of your other rights). This is another appropriate security measure to ensure that personal information is not disclosed to any person who has no right to receive it.

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Data protection officer

We have appointed a data protection officer (DPO), Stephen Reilly, 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 on;

Email address: dpenquiries@sovini.co.uk

Telephone number: 0333 733 1200

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.

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Changes to this privacy notice

We keep our Privacy Notice under regular review. This version was last updated in August 2021. Historic versions can be obtained by contacting us.

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.