

## Job Applicants Privacy Policy : May 2018

As part of our application and recruitment process [Seanamic Group Ltd / IMES International Ltd / Caley Ocean Systems Ltd / Flexlife Ltd / Umbilicals International (UK) Ltd] collects, handles, uses, processes and stores personal information about you ("processing"). We will process this information for a range of purposes relating to the recruitment process, and this may include information from your application/CV and any other documentation you provide during the recruitment process.

### Why do we collect your personal information?

- i) We have a legitimate interest in processing personal data during the recruitment process and for keeping records of that process. Processing data from job applicants allows us to manage the recruitment process, assess and confirm a candidate's suitability for employment and decide to whom to offer a job. We may also need to process data from job applicants to respond to and defend against legal claims.
- ii) If we need to make reasonable adjustments to the recruitment process for candidates who have a disability, where necessary.
- iii) In some cases, we need to process data to ensure that we are complying with our legal obligations, for example we are required to check a successful applicant's eligibility to work in the UK before employment starts
- iv) If your application is unsuccessful, we will keep your personal data on file in case there are future employment opportunities for which you may be suited. We will ask for your consent before we keep your data for this purpose and you are free to withdraw your consent at any time.

### What information might we process?

We may process a range of information about you, this includes: -

- i) Personal details such as name, address and contact details, date of birth
- ii) Work history – previous employers, dates, positions
- iii) Compensation – basic salary and benefits
- iv) Professional qualifications and skills
- v) Employment references
- vi) Nationality / visa / right to work permit information

During the process we may also inadvertently capture some special categories of personal information about you, where this has been provided or made available by you or can be inferred from your CV. We may also process certain special categories of information about you, i.e. information about a physical or mental health condition, in order to make reasonable adjustments during the recruitment process, where necessary. Where we are processing personal information based on your consent, you have the right to withdraw that consent at any time where there is no other legal basis for the processing.

We collect this information in a variety of ways. For example, data might be contained in application forms, CVs, obtained from your passport or other identity documents, or collected through interviews.

### Who has access to data?

Data will be stored in a range of different places, including on your application/recruitment record and on the IT network system (including email).

Your information may be shared internally for the purposes of the recruitment exercise. This includes members of the HR and recruitment team, interviewers involved in 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 role.

We will not share your data with third parties, unless your application for employment is successful and we make you an offer of employment. We will then share your data with former employers to obtain references for you.

We will not transfer your data outside the European Economic Area (EEA) unless you are applying for a position outside of the EEA.

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

We take the security of your data seriously. We have internal policies and controls in place to ensure that your data is not lost, accidentally destroyed, misused or disclosed, and is not accessed except by our employees in the proper performance of their duties.

## **For how long does the company keep data?**

If your application for employment is unsuccessful, we will hold your data on file for 6 (six) months after the end of the relevant recruitment process. If you agree to allow the company to keep your personal data on file, we will hold your data on file for a further 6 (six) months 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 personnel file (paper based) and retained during your employment. The periods for which your data will be held will be provided to you in a new privacy notice.

## **Your rights**

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

- access and obtain a copy of your data on request;
- require the company to change incorrect or incomplete data;
- require the company to delete or stop processing your data, for example where the data is no longer necessary for the purposes of processing;
- object to the processing of your data where the company is relying on its legitimate interests as the legal ground for processing; and
- ask the company to stop processing data for a period if data is inaccurate or there is a dispute about whether or not your interests override the company's legitimate grounds for processing data.

If you believe that we have not complied with your data protection rights, you can complain to the Information Commissioner.

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

## **Access your personal information**

If you would like to exercise any of your rights or access the personal information that we hold. Email your request to our Data Protection Compliance Officer, Amie Shewan ([hr@seanamic.com](mailto:hr@seanamic.com)).

## **Changes to this privacy notice**

We keep our privacy notice under regular review. This privacy notice was last updated on 25<sup>th</sup> May 2018.