

Applicant Privacy Policy



Document Control & Control of Records Policy

Version: v2

Date: 08/12/2020

Contents

1.0	Introduction.....	3
2.0	What information does Inenco collect?	3
3.0	Why does Inenco process personal data?	3
4.0	Who has access to data?	4
5.0	Automated decision-making	4
6.0	How does Inenco protect data?	4
7.0	For how long does Inenco keep data?.....	4
8.0	Your rights	5
9.0	What if you do not provide personal data?.....	5

1.0 Introduction

Data controller: Inenco Group Limited, Ribble House, Ballam Road, Lytham, FY8 4TS

Data Protection Lead: Contact Details: RiskandCompliance@inenco.com

As part of any recruitment process, Inenco collects and processes personal data relating to job applicants. Inenco is committed to being transparent about how it collects and uses that data and to meeting its data protection obligations.

Inenco has the right to update this policy at any time.

2.0 What information does Inenco collect?

As an applicant, Inenco collects a range of information about you. This includes:

- Your name, address and contact details, including email address and telephone number;
- Details of your qualifications, skills, experience and employment history;
- Information about your current level of remuneration, including benefit entitlements;
- Whether or not you have a disability for which Inenco needs to make reasonable adjustments during the recruitment process;
- Information about your entitlement to work in the UK; and
- Information provided on a DBS check or Experian financial check where this is a requirement of your role

Inenco may 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 or other forms of assessment and where appropriate psychometric testing.

Inenco may also collect personal data about you from third parties, such as references supplied by former employers or DBS checks. Inenco 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.

Data will be stored in a range of different places, including on your application record, in HR management systems and on other IT systems (including email).

3.0 Why does Inenco process personal data?

Inenco needs to process data in the recruitment process prior to entering into a contract with you and subsequently may also need to process your data in order to enter into a contract with you.

In some cases, Inenco needs 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.

Inenco has a legitimate interest in processing personal data during the recruitment process and in keeping records of the process. Processing data from job applicants allows Inenco to manage the recruitment process, assess and confirm a candidate's suitability for employment and decide to whom to offer a job. Inenco may also need to process data from job applicants to respond to and defend against legal claims.

We may process special categories of data, such as information about ethnic origin, sexual orientation or religion or belief, to monitor recruitment statistics. We may also collect information about whether

or not applicants are disabled to make reasonable adjustments for candidates who have a disability. Inenco processes such information to carry out our obligations and exercise specific rights in relation to employment.

If your application is unsuccessful, we may keep your personal data on file in case there are future employment opportunities for which you may be suited. Inenco will ask for your consent before we keep your data for this purpose, and you are free to withdraw your consent at any time.

4.0 Who has access to data?

Your information may be shared internally for the purposes of the recruitment exercise. This includes members of the HR, recruitment team, personal assistants and interviewers involved in the recruitment process, managers in the business area with a vacancy and Finance and IT staff if access to the data is necessary for the performance of their roles.

Inenco will not share your data with third parties, unless your application for employment is successful and it makes you an offer of employment. Inenco will then share your required data with former employers to obtain references for you.

Inenco will not transfer your data outside the European Economic Area (EEA).

5.0 Automated decision-making

Recruitment processes are not based solely on automated decision-making.

6.0 How does Inenco protect data?

Inenco takes 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. Further information on this can be found in the Information Security Policy and the Data Protection Policy.

7.0 For how long does Inenco keep data?

If your application for employment is unsuccessful and you applied through our Recruitment portal, Inenco will hold your data for 12 months from your last activity on the portal.

If you agree to allow Inenco to keep your personal data on file, Inenco will hold your data on file for a further 12 months for consideration for future employment opportunities. At the end of that period or once you withdraw your consent, 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 employee file and retained during your employment. The periods for which your data will be held will be provided to you in an employee privacy notice.

8.0 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 Inenco to change incorrect or incomplete data;
- Require Inenco to delete or stop processing your data, for example where the data is no longer necessary for the purposes of processing; and
- Object to the processing of your data if you do not believe that Inenco has legitimate grounds to process your data.

If you would like to exercise any of these rights, please submit your request via the online tool on our Company website.

If you have a concern regarding how we handle your personal data then we would request that you inform our Data Protection Lead about it first so that we can work with you in an effort to resolve it.

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

9.0 What if you do not provide personal data?

You are under no statutory or contractual obligation to provide data to Inenco during the recruitment process. However, if you do not provide the information, we may not be able to process your application properly or at all.



www.inenco.com