

Job Applicant Privacy Notice in compliance with GDPR

Data controller: Phillip Wilcox-Moore, Managing Director, Axter Ltd

As part of any recruitment process, Axter Ltd (the Company) collects and processes personal data relating to job applicants. The Company is committed to being transparent about how it collects and uses that data and to meeting its data protection obligations.

What information does the Company collect?

The Company 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 the Company needs to make reasonable adjustments during the recruitment process.
- information about your entitlement to work in the UK; and
- equal opportunities monitoring information, including information about your ethnic origin, sexual orientation, health and religion or belief.

The Company may collect this information in a variety of ways. For example, data might be contained in application forms, CVs or resumes, obtained from your passport or other identity documents, or collected through interviews or other forms of assessment, including online tests.

The Company may also collect personal data about you from third parties, such as references supplied by former employers, information from employment background check providers and information from criminal records checks. The Company 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). All data is held securely, and retention periods comply with GDPR recommendations.

Why does the Company process personal data?

The Company needs to process data to take steps at your request prior to entering into a contract with you. It may also need to process your data to enter into a contract with you.

In some cases, the Company needs to process data to ensure that it is complying with its legal obligations. For example, it is required to check a successful applicant's eligibility to work in the UK before employment starts.

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

The Company may process information about whether or not applicants are disabled to make reasonable adjustments for candidates who have a disability. This is to carry out its obligations and exercise specific rights in relation to employment.

Where the Company processes other special categories of data, such as information about ethnic origin, sexual orientation, health or religion or belief, this is for equal opportunities monitoring purposes.

For some roles, the Company is obliged to seek information about criminal convictions and offences. Where the Company seeks this information, it does so because it is necessary for it to carry out its obligations and exercise specific rights in relation to employment.

If your application is unsuccessful, the Company may keep your personal data on file in case there are future employment opportunities for which you may be suited. The Company will ask for your consent before it keeps your data for this purpose and you are free to withdraw your consent at any time. Your application will be held no longer than one year.

Who has access to data?

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 roles.

The Company will not share your data with third parties, unless your application for employment is successful and it makes you an offer of employment. The Company will then share your data with, for example, **former** employers to obtain references for you, organisations to obtain any necessary background checks; payroll processors, pension providers and our parent company HR department at Axter S.A. in Paris.

Transferring information outside of the EEA

The data that we collect from you may be transferred to, and stored at, a destination outside the European Economic Area ("EEA").

We are committed to ensuring that adequate safeguards are in place when transferring Personal Data outside the EEA. As such, we will take reasonable steps to ensure that your personal information is adequately protected in accordance with the requirements of UK data protection law.

How does the Company protect data?

The Company takes the security of your data seriously. It has 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, the Company will hold your data on file for three months after the end of the relevant recruitment process. If you agree to allow the Company to keep your personal data on file, the Company will hold your data on file for a further nine months (one year in total) 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 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 several 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
- request the transfer of your data.

If you would like to exercise any of these rights, please contact Phillip Wilcox-Moore, Managing Director, Axter Ltd, email: pwilcox.moore@axterltd.co.uk, Tel 01473 724056.

If you believe that the Company has 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, the Company may not be able to process your application properly or at all.

Automated decision-making

Automated decision-making takes place when an electronic system uses personal information to make a decision without human intervention. The Company will only use automated decision-making in the following circumstances:

1. Where we have notified you of the decision and given you 21 days to request a reconsideration.
2. Where it is necessary to perform the contract with you and appropriate measures are in place to safeguard your rights.
3. In limited circumstances, with your explicit written consent and where appropriate measures are in place to safeguard your rights.

If the Company makes an automated decision on the basis of any particularly sensitive personal information, we must have either your explicit written consent or it must be justified in the public interest, and we must also put in place appropriate measures to safeguard your rights.

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 you have been notified.

The Company does 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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