

# Job Applicant Privacy Notice

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Document Name	Job Applicant Privacy Notice
Document Number	CMT35040
Purpose	To ensure job applicants understand which data we collect, our lawful bases, what we do with their data and their rights as a data subject
Connecting Documents	N/A
Revision Number	2.0

We (CMT Equipment Ltd T/A CMT Group/Safesmart Access) collect certain information about you and from you as part of our recruitment process.

For example, this includes:

- Your name
- Your personal contact details
  - Your previous experience
    - Your qualifications
- Your previous employer references
- Your entitlement to work in the UK (including copies of identity documents)
  - Your current level of renumeration
    - Notes of interviews

It could also include a copy of your driving licence and any motoring offences if this is relevant to the job role.

Our lawful bases for collecting this information are legitimate interest and legal obligation.

We collect it to help us make informed decisions on the most suitable candidate for the role available.

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We sometimes use it to measure statistics about our recruiting methods; in this case, your data will always be anonymised (all details that could be traced back to you will be removed).

We have to collect some of this data for legal reasons, for example passport details to ensure you have the right to work in the UK.

We will not share this data with anyone else as part of the recruitment process.

We will not transfer your data outside the EEA.

If your application is successful, we may share your data with third, such as external payroll providers; we will always ask your consent first. We will keep your data for tax purposes and to speed up our induction process. We will also keep it to ensure you have access to any future positions in the company which could be suited to your skills and experience.

Please see our 'employee privacy notice' for further details on what we do with your data after you are employed, including for how long we store this data.

If your application is not successful, but we think you could be successful in an alternative future position at CMT Group, we will keep your data in a secure location for 5 years. You have the right to opt out of this if you want to.

If your application is not successful, and we have no reason to retain your data, all data will be deleted. The only exception to this is data we fully anonymise and use for training purposes, for example interview notes. You have the right to opt out of this if you want to.

You have a number of rights regarding your data; you have the right to request:

- that your data is deleted
- that you can access or view the data
- that you can update or correct the data

If you wish to exercise your rights, please contact <a href="mailto:dataprotection@cmt.co.uk">dataprotection@cmt.co.uk</a>

If we can't fulfil your request, for example for legal reasons, we will fully explain why.

We take your data very seriously; it is stored in a secure location that only HR personnel can access. We have internal policies to ensure it is not lost, misused, accidentally deleted or disclosed to anyone who shouldn't have access.

Legally, you don't have to provide any personal data as part of the recruitment process; however, without it, we may not be able to process your application for employment.

#### **Additional Details**

Maintaining the security of your data is of paramount importance to us and we are committed to respecting your privacy rights.

This notice applies when using the Talos website/software.

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We have drafted this Privacy Policy to provide you notice of our data and security practices and policies as you use the careers page of our website. This Privacy Policy describes the types of Personal Information we collect, how we use the information, with whom we share it, and the choices you can make about our collection, use and disclosure of your Personal Information. The phrase "Personal Information" refers to information that may be used to personally identify you, such as your name, address, telephone number, email address, We also describe the measures we take to help protect the security of your Personal Information and how you can contact us about our privacy practices. Please do not provide us with highly sensitive information such as National Insurance Numbers, financial information or health records. This Privacy Policy incorporates by reference the Terms and Conditions for CMT Group, which apply to this Privacy Policy. When you visit the website or provide us with information, you consent to our use and disclosure of the information we collect or receive as described in this Privacy Policy.

Please review this Privacy Policy periodically as we may update it from time to time without prior notice to reflect changes in our data practices.

#### Information We Collect

We may obtain information about you that you upload to our CMT Group careers portal or that may be provided to us by a recruitment agent. The types of information we may obtain include:

- Your Personal Information, if you choose to provide it or if we obtain it in the manner described above. You do not have to give us any Personal Information in order to perform job searches or to read the content portions of the Careers portal.
  - We collect this information from your resume or in the manner described above.
  - Other details that you may submit to us or that may be included in the information provided to us by third parties.

In addition, when you visit the CMT Group careers portal, we may collect certain information by automated means, such as cookies, as described in more detail below. The information we may collect by automated means includes:

- Information about the devices our visitors use to access the Internet (such as the IP address and the device, browser and operating system type).
- Pages and URLs that refer visitors to the CMT Group careers portal, also pages and URLs that visitors exit to once they leave CMT Group careers portal.
  - Dates and times of visits to the CMT Group careers portal
- Information on actions taken on the CMT Group careers (such as page views, site navigation patterns and job view or application activity).
- A general geographic location (such as country and city) from which a visitor accesses the CMT Group careers portal.
  - Search terms that visitors use to reach the CMT Group careers portal.

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#### How We Use the Information We Collect

We may use the information we obtain about you to:

- Maintain a record of the jobs you view or apply to.
- Inform you of relevant job postings that may be of interest to you. If you provide the name and email address of your friends or family members when you ask us to email a job posting on your behalf please ensure that you only submit email addresses of individuals with whom you have a personal or family relationship and who have agreed to receive the job posting from us.
  - Respond to your questions and comments and provide customer support.
- To contact you and deliver marketing and promotional communications to you by email, text message or other means that, in some cases, is targeted to your interests (such as relevant services, educational or other career development opportunities) and to solicit your feedback and input. These communications will contain links for preference management and, where appropriate, unsubscribe links should you decide you do not want to receive further communications. Please note that if you unsubscribe from receiving marketing and promotional communications, you may continue to receive transactional and operational emails from us.
  - Operate, evaluate and improve our business and the products and services we offer.
- Analyse and enhance our marketing communications and strategies (including by identifying when emails we have sent to you have been received and read).
- Analyse trends and statistics regarding visitors' use of the CMT Group careers portal and the jobs viewed or applied to on the CMT Group careers portal.
- Protect against and prevent fraud, unauthorized transactions, claims and other liabilities, and manage risk exposure, including by identifying potential hackers and other unauthorized users.
  - Comply with applicable legal requirements and industry standards and our policies.

We also use non-personally identifiable information and certain technical information about your computer and your access of the CMT Group careers portal (including your internet protocol address) in order to operate, maintain and manage the CMT Group careers portal. We collect this information by automated means, such as cookies as described in more detail below.

If we seek to use the information we obtain about you in other ways, we will provide specific notice and request your consent at the time of collection.

## Information We Share

When you apply for a job through CMT Group careers portal, we provide your Personal Information to the hiring Manager (including your e-mail address and other

contact information that you publish on your resume). The hiring Manager may use your information to contact you directly.

We also may share Personal Information with our service providers who help us in the delivery of our own products and services to you. These service providers may only use or disclose the information as necessary to perform services on our behalf or as otherwise required by law.

CMT Group also may disclose specific user information when we determine, in good faith, that such disclosure is necessary to comply with the law, to cooperate with or seek assistance from law enforcement, to prevent a crime or protect national security, or to protect the interests or safety of CMT Group staff.

In addition, Personal Information we have collected may be passed on to a third party in the event of a transfer of ownership or assets or a bankruptcy or other corporate reorganization of CMT Group.

# **About Cookies, Tracking Choices**

A "cookie" is a text file that websites send to a visitor's computer or other Internetconnected device to uniquely identify the visitor's browser or to store information or settings in the browser.

CMT Group uses cookies and other similar technologies for the convenience of our users. Cookies enable us to serve secure pages to our users without asking them to sign in repeatedly. CMT Group careers portal also uses cookies to store non-personally identifying information about you such as past jobs viewed and job searches within CMT Group conducted by your computer in a cookie that it places on your computer. We do this in order to present you with job recommendations based on your interests as expressed previously through your searches. Lastly, cookies are used to ensure the proper functioning and efficiency of the CMT Group careers portal. Most internet browsers enable you to erase cookies from your computer hard drive, block all cookies, or receive a warning before a cookie is stored. Please be aware, however, that some features or services may not function properly without cookies.

## **Update Your Account Information**

You may access, update and amend some of the Personal Information in our custody and control at any time by requesting us to do so. Please note, however, that you will not be able to delete certain information, including your resume, once such information has been uploaded to the CMT Group careers portal.

### **How We Protect Personal Information**

CMT Group maintains administrative, technical and physical safeguards designed to assist us in protecting the Personal Information we collect against accidental, unlawful or unauthorized destruction, loss, alteration, access, disclosure or use.

Please note that no electronic transmission of information can be entirely secure. We cannot guarantee that the security measures we have in place to safeguard Personal Information will never be defeated or fail, or that those measures will always

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be sufficient or effective. Therefore, although we are committed to protecting your privacy, we do not promise, and you should not expect, that your Personal Information will always remain private. As a user of CMT Group Careers portal, you understand and agree that you assume all responsibility and risk for your use of the website, the internet generally, and the documents you post or access and for your conduct on and off the website.

# How Long We Keep Personal Information

If you are unsuccessful at any stage of the process, the information you have provided until that point will be retained for 6 months from the closure of the campaign. Information generated throughout the assessment process, for example interview notes, is retained by us for 6 months following the closure of the campaign.

Equal opportunities information is retained for 6 months following the closure of the campaign whether you are successful or not. If you are successful in your application, we will retain your information in accordance with our Privacy Notice for Employees, Workers and Contractors. A copy of this Notice will be provided to you with your offer letter.

## Children's Privacy

We do not knowingly collect or solicit information from anyone under the age of 16. In the event that we learn that we have collected personal information from a child under the age of 16, we will delete that information as quickly as possible.

## **Your Rights**

At any point while we are in possession of or processing your personal data, you, the data subject, have the following rights:

- Right of access you have the right to request a copy of the information that we hold about you.
- Right of rectification you have a right to correct data that we hold about you that is inaccurate or incomplete.
- Right to be forgotten in certain circumstances you can ask for the data we hold about you to be erased from our records.
- Right to restriction of processing where certain conditions apply to have a right to restrict the processing.
- Right of portability you have the right to have the data we hold about you transferred to another organisation.
- Right to object you have the right to object to certain types of processing such as direct marketing.
- Right to object to automated processing, including profiling you also have the right not to be subject to the legal effects of automated processing or profiling.

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Right to judicial review: in the event that we refuse your request under rights
of access, we will provide you with a reason as to why. You have the right to
complain as outlined below in the contact section.

All of the above requests will be forwarded on should there be a third party involved in the processing of your personal data.

You can also exercise the right at any time by contacting us at CMT Group by any of the means outlined below.

Our Website may, from time to time, contain links to and from the websites of our partner networks, advertisers and affiliates. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for these policies. Please check these policies before you submit any personal data to these websites.

## **How to Contact Us**

You can direct questions regarding this Privacy Policy

If you have any questions about how we use your personal data that are not answered here, or if you want to exercise your rights regarding your personal data, please contact us by any of the following means:

- Email us on dataprotection@cmt.co.uk
- Write to us at: Compliance Department, Trident Works, Mulberry Way, Belvedere DA17 6AN

Please include your name and email address in email requests, and your name and postal address in mail requests

Date	21/12/2020
Review Date	21/12/2021
Signed	
Position	Compliance Manager

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