

## **GDPR Candidate Privacy Policy and Processing Notice**

*Last updated May 2020*

Depaho Ltd (“Company” or “we”) respects your privacy and is committed to protecting your personal data. The Company is a “data controller” this means that we are responsible for deciding how we hold and use personal data about you. This notice is aimed at informing you of how and why your personal data will be used, namely for the purposes of the recruitment and how long it will usually be retained for. It provides you with certain information that must be provided under the General Data Protection Regulation EU 2016/679.

### **Data Protection Principles**

The Company will comply with data protection law and principles, which means that your data will 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 informed you about.
- Kept securely.

### **What Personal Information We Hold about a Candidate**

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

- The data you have provided in your curriculum vitae (CV) and covering letter. The data provided may include but are not limited to the: name, address, telephone number, personal email address, date of birth, gender, employment history, qualifications, nationality, social media accounts, profession, professional memberships, educational achievements, diplomas, transcripts, languages, computer skills, national service completion (if applicable), identification number.
- Any data you provide to us during an interview including any further details of your qualifications, experience, interests and other skills.

### **How We Collect Personal Data**

We may collect personal data about candidates from the following sources:

- You, the candidate.
- Your named referees, from whom we collect the following categories of data: full name, periods of previous employment, performance during previous employment.

- From publicly accessible sources, such as LinkedIn, Ergodotisi, etc., where we collect your full name, email, work history, and other data included on your profile.
- From recruitment agencies from which we collect the following categories of data: any information that you may have provided on any application form or curriculum vitae, including name, title, address, telephone number, personal email address, date of birth, gender, employment history qualifications

### **How We Will Use Data About You**

The Company will use the personal data it collects about you to:

- Assess your skills, qualifications, and suitability for the role.
- Carry out background and reference checks, where applicable.
- Communicate with you about the recruitment process.
- Keep records related to our hiring processes.
- Comply with legal or regulatory requirements.

The Company will also need to process your personal data to decide whether to enter into a contract with you.

Having received your CV and covering letter, we will then process that data to decide whether you meet the basic requirements to be shortlisted for the role. If you do, we will decide whether to invite you for an interview. If we decide to call you for an interview, we will use the data you provide to us at the interview to decide whether to offer you the role. If we decide to offer you the role, we may then take up references and/or any other check before confirming your appointment.

### **If You Fail to Provide Personal Data**

If you fail to provide personal data when requested, which is necessary for us to consider your application (such as evidence of qualifications or work history), we may not be able to process your application further. For example, if we require references for this role and you fail to provide us with relevant details, we may not be able to take your application further.

### **How We Use Sensitive Personal Data**

The Company may use sensitive personal data in the following ways:

- We will use data 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 during an interview.
- We will use data about your nationality or ethnicity, to assess whether a work permit and a visa will be necessary for the role.

### **Automated Decision-Making**

The Company will not make decisions based solely on automated decision-making.

## **Data Sharing**

The company may share the candidate's personal data with entities within the group. The data sharing shall be with the only purpose to test a candidate's suitability for a role. The Company does not share personal data with third parties unless the Company has a legal obligation to do so.

## **Data Security**

The Company has put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorized way, altered or disclosed. In addition, we limit access to your personal data to employees necessary for the recruitment process.

The Company has implemented procedures to deal with any suspected data security breach and shall notify you and any applicable regulator of a suspected breach where we are legally required to do so.

## **Data Retention**

We shall retain your personal data for a period of 3 years after your last application date. We retain your personal data 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. We further retain such personal data in case a similar role becomes vacant for which you shall be a fitting candidate. After this period, we will securely destroy your personal data in accordance with our data retention policy.

## **Rights of Access, Correction, Erasure, And Restriction**

### **➤ Your rights in connection with personal data**

Under certain circumstances, by law you have the right to:

- Request access to your personal data (commonly known as a "data subject access request"). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.
- Request correction of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected.
- Request erasure of your personal data. This enables you to ask us to delete or remove personal data 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 data where you have exercised your right to object to processing.
- Object to processing of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your 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 data for direct marketing purposes.
- Request the restriction of processing of your personal data. This enables you to ask us to suspend the processing of personal data about you, for example if you want us to establish its accuracy or the reason for processing it.

- Request the transfer of your personal data to another party.

In the event that you want to review, verify or correct your personal data or to request erasure of your personal data or object to the processing of your personal data, please send an email to [career@depaho.com](mailto:career@depaho.com)

### **Right to Withdraw Consent**

You have the right to withdraw the consent you gave us in relation to the further retention of your personal data for a total period of 3 years, at any time. To withdraw your consent, please send an email to [career@depaho.com](mailto:career@depaho.com) expressing the withdrawal of your consent. Once we have received notification that you have withdrawn your consent, we will no longer process your application and, subject to our retention policy, we will dispose of your personal data securely.

### **ADDRESS DATA PROTECTION QUERIES**

The Company has appointed a Data Protection Officer to oversee compliance with this privacy notice. If you have any questions about this privacy notice or how we handle your personal data, please contact the Data Protection Officer for data protection issues at the following address [dpo@depaho.com](mailto:dpo@depaho.com).