

Privacy Notice – Employee Recruitment

What does this Privacy Notice cover?

This Privacy Notice is for information only and you do not need to take any action. It is aimed at candidates who have applied to us direct or via a recruitment agent.

If you are a recruiter, we will process your personal data (which is likely to consist of your name and contact details) to enable us to take forward the application of the candidate(s) that you represent. This Privacy Notice will apply to any personal data you supply to us as part of any recruitment exercise in which you put forward any candidate(s).

Your privacy is important to us

Domino UK Limited (the “**Company**”) is committed to protecting the privacy and security of personal data. This Privacy Notice explains the types of personal data we may collect about you when you interact with us via our recruitment portal. It also explains how we store and handle that data and keep it safe and what rights you have in relation to it. This Privacy Notice does not constitute, or form part of, any contract between us.

While the content of this Privacy Notice is accurate at the date of issue, the Company may need to make changes in the future and you will be able to come back and check for any updates.

Key definitions

The Company is a data controller. This means that we are responsible for deciding how we hold and use personal information about you.

“**Personal data**” is information relating to you as a living, identifiable individual.

“**Processing**” your data includes various operations that may be carried out on your data, including collecting, recording, organising, using, disclosing, storing and deleting it.

The law requires us:

- to process your data in a lawful, fair and transparent way;
- to only collect your data for explicit and legitimate purposes;
- to only collect data that is relevant, and limited to the purpose(s) we have told you about;
- to ensure that your data is accurate and up to date;

- to ensure that your data is only kept as long as necessary for the purpose(s) we have told you about; and
- to ensure that appropriate security measures are used to protect your data.

Our recruitment portal

The software we use for recruitment is called Sage People. This means that your personal data is processed by Sage People on behalf of the Company, following the instructions the Company sets out. If you have questions about how Sage People processes personal data please contact us.

Why we need personal information

The Company needs personal information about you to move your application forward, to assess your suitability for the role you have applied for and to get in contact with you in relation to your application.

If you decide not to provide the information we need when requested, this may prevent us from successfully progressing your application for employment with us. It may also be possible for you to remove certain information from the portal, but again this may prevent us from progressing your application. Further information about requesting deletion of your personal data is set out later in this Privacy Notice.

The law on data protection sets out a number of different reasons or conditions for which an organisation may collect and process your personal data, including contractual obligations, compliance with our legal obligations, legitimate interests, vital interests and consent. We will process your personal data to move your application forward prior to entering into a contract of employment. In addition, you and we have a legitimate interest in assessing your suitability for any role for which you have applied. Processing will be carried out with appropriate safeguards and in a manner which respects your rights, freedoms and interests.

We will only rely on your consent as a basis for processing your personal data where no other legal basis is applicable and this is likely to apply only in very limited circumstances. You are entitled to withdraw your consent at any time. This may mean that we are not able to provide you with information in which you may subsequently have an interest.

What personal information we need

The Company will only collect and use information that is relevant to the recruitment process, as determined by us and/or by you. Much of this information will be provided by you or by the Company but may also originate from third parties, for example referees. Depending on your circumstances, the personal data we will process and hold about you will include the information you provided in your application, any additional information provided via our online recruitment portal and any information you provide during the recruitment process. We anticipate that this personal data is likely to include:

- contact details such as name, title, addresses, telephone numbers, and personal email addresses;
- evidence of how you meet the requirements of the job, including information about your education and qualifications;
- evidence of your right to work in the UK and immigration status;
- diversity and equal opportunities monitoring information – this can include information about your race or ethnicity, religious beliefs, sexual orientation, disability and other ‘special category data’;
- information about your health, including any medical needs or conditions for which you may ask us to make adjustments during the recruitment process;
- Quest personality and aptitude report;
- DBS checks including association identity documents and certificate;
- correspondence from educational institutions;
- driving licence details and associated checks;
- reference details for the past 3 years;
- information for aviation security checks requiring 5 years references in addition to full occupation history to be verified for the past 5 years;
- if you contact us regarding your application, a record of that correspondence;
- details of your use of our recruitment tools and services, such as your candidate profile and alerts for vacancies; and
- the status of your application and updates on how it moves forward.

If your application is successful and we are in a position to offer you employment with us, we will need additional information from you. We will tell you what we need at that point, and will send you a separate privacy notice explaining why we need it. At this point we will also seek contact details from you for referees so that we may seek references from them and any offer of employment shall be subject to the receipt of satisfactory references.

Special category information

Certain types of personal data, known as special category data, require higher levels of protection. We need to have further justification for collecting, storing and using this type of personal data. We aim to collect and process special category data as little as possible.

Personal data is defined as ‘special category’ when it reveals racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership. It includes genetic data, biometric data that uniquely identifies a person, data concerning health and data concerning someone’s sex life or sexual orientation

We will use your special category information in the following ways:

- we will use information 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 a test or interview;
- we will use information about your race or national or ethnic origin, religious, philosophical or moral beliefs, or sexual orientation, to ensure meaningful equal opportunity monitoring and reporting. This information will not be available to anyone involved in the selection process and will not be published except as part of a set of anonymised statistics.

Sharing personal information

We will only share it with third parties if we are allowed or required to do so by law. Where information is shared with third parties, we will seek to share the minimum amount of information necessary to fulfil the relevant purpose.

We will only share your personal information with the following third parties for the purposes of processing your application:

- Eras Ltd for the purpose of psychometric testing;
- DVLA;
- DBS.

All of our third-party service providers and other entities in the group are required to take appropriate security measures to protect your personal information in line with our policies. We do not allow our third-party service providers to use your personal data for their own purposes. We only permit them to process your personal data for specified purposes and in accordance with our instructions.

If you are successfully recruited, we will upload your details to our HR system. As a member of staff you will sign a contract of employment and agree to additional terms on how your data is handled and stored.

We will share your data for statistical analysis (it will be anonymised first) if we are required to do so by law – for example, by court order, or to prevent fraud or other crime.

We do not, and will not, sell your data to third parties.

We may transfer personal data that we collect from you to third-party data processors in countries that are outside the UK, but we will only do so if an adequacy decision of the European Commission is in place, or appropriate data protection safeguards have been put in place, or it is otherwise lawful to transfer the data. For example, this might be required when we store data in a Cloud Service, or engage international firms to carry out data processing activities on our behalf.

Data security

We have put in place appropriate security measures to protect the security of your information and to prevent your personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal information to those employees, agents, contractors and other third parties who require any information as part of the recruitment process. They will only process your personal information on our instructions and will be subject to a duty of confidentiality and will have agreed to keep your personal data secure.

We have put in place procedures to deal with any suspected data security breach and will notify you and any applicable regulator of a suspected breach where we are legally required to do so.

Storage and destruction

Whenever we collect or process your personal data, we will only keep it for as long as is necessary for the purpose for which it was collected.

The length of time for which we retain data will be determined by taking into account factors such as:

- the amount, nature, and sensitivity of the personal data;
- the potential risk of harm from unauthorised use or disclosure of your personal data;
- the purposes for which we process it; and
- whether we can achieve those purposes in other ways.

Retention periods may increase as a result of changes in legislation, and in the circumstances of legal proceedings it may be necessary to suspend the deletion of personal data. At the end of the retention period your data may be deleted completely, put beyond use or anonymised.

Anonymous data is no longer personal data and as such is not subject to data protection legislation requirements.

It is likely that we will retain your personal information for six months after we have communicated to you our decision about whether to appoint you. This is 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. After this period, we will securely destroy your personal information unless your application had been successful and you have started employment with us.

Your rights

Subject to certain conditions and exceptions set out in UK data protection law, you have:

- the right to request access to a copy of your data, as well as to be informed of various information about how your data is being used;
- the right to have any inaccuracies in your data corrected, which may include the

right to have any incomplete data completed;

- the right to have your personal data erased in certain circumstances;
- the right to have the processing of your data suspended, for example if you want us to establish the accuracy of the data we are processing;
- the right to receive a copy of data you have provided to us, and have that transmitted to another data controller;
- the right to object to any direct marketing (for example, email marketing or phone calls) by us, and to require us to stop such marketing;
- the right to object to any automated decision-making about you which produces legal effects or otherwise significantly affects you; and
- where the lawful basis for processing your data is consent, you have the right to withdraw your consent at any time. When you tell us you wish to exercise your right, we will stop further processing of such data. This will not affect the validity of any lawful processing of your data up until the time when you withdrew your consent. You may withdraw your consent by contacting us using the contact details below.

Some of these rights are not automatic and we reserve the right to discuss the basis of your request with us before taking action.

Please contact us in relation to any such requests (contact details below). To protect the confidentiality of your information and the interests of the Company, we may ask you to verify your identity before proceeding with any request to exercise the above rights. If you have authorised a third party to submit a request on your behalf, we will ask them to prove they have your permission to request such information.

We may retain anonymised diversity monitoring data and anonymised data about where applicants saw vacancies for a longer period in order to assist with our diversity monitoring and recruitment procedures.

If you would like further information about your rights, you can look at the website of the Information Commissioner's Office (www.ico.org.uk) or you can contact the Company (contact details below).

If you have any issue in relation to the Company's handling of your personal information, please contact us (contact details below). If you feel that your data has been handled incorrectly, or you

are unhappy with the way we have dealt with your query regarding the way we use your personal data, you have the right to complain to the Information Commissioner's Office.

Visitors to our website

As part of the recruitment process, you may wish to visit our website. Please see our separate cookies policy, which is available on our website, for how we use cookies on our website.

Contact details

If you have any questions about this privacy notice and/or how we will use your personal data, please contact the Data Protection Officer at data.privacy@domino-printing.com.