

# A&P GDPR APPLICANT PRIVACY NOTICE

The A&P General Data Protection Regulations (GDPR) Policy governs the use and storage of your personal data. You can see our GDPR Policy on the company website. This Applicant Data Protection Policy relates to the specific processing of personal data of applicants applying for a job at A&P Group or its affiliates.

As part of our recruitment drive within A&P Group we have specifically designed a privacy policy to ensure your data is secure. We understand the need for quality and competent workers and our inhouse team takes your safety very seriously and we want to ensure you are confident in our procedures when sharing your data with us.

Any reference in this Data Protection Policy to certain laws or regulations also includes any change, replacement or annulment of these laws or regulations, including any related executive decisions.

We reserve the right to modify this Applicant Data Protection Policy from time to time at our own discretion. Such modification will be communicated via the Websites, and/or company social media sites. We will also send you an email which will prompt you to opt in or opt out of the updated policy. If we do not hear from you your data will automatically be deleted.

## 1. HOW TO MAKE AN APPLICATION TO US

For all recruitment purposes we use a generic email of <u>labour@ap-group.co.uk</u> and we advertise vacancies directly on our Website and Social Media accounts. If you are interested in a vacancy advertised, we would ask you to 'Apply' directly to the relevant vacancy. If there isn't a live vacancy to match your skillset, we will ask you to 'Register' your details for future vacancies.

#### 2. WHAT DATA WE COLLECT & HOW WE COLLECT IT

You may have made an application directly to us via email or a job advert, through social media, or by telephone. A&P is a Controller of the personal data that you (the data subject) provide us with. We collect and hold the following types of personal data from you:

- Name, address, telephone contact number, date of birth, next of kin, bank details, medical declaration
- Employment history, salary/pay details (including pension), training records, occupational health records, attendance records

The other information that A&P Group collects about you will vary, dependent on the nature of the services you are providing to A&P Group

A&P Group do from time to time use recruitment companies to provide labour for specific areas of the business. If you share you details with an external agency provider, i.e a recruitment company, you will need to clarify their Privacy Policy for information shared. We will not send any of the personal data you provide via <u>'labour@ap-group.co.uk'</u> or our website or in any other manner to external recruitment agencies unless you explicitly consent to it.

As part of our recruitment process, when applying for a live vacancy or registering for a future vacancy sensitive data will not be requested. Sensitive data are personal data that pertain to your race or ethnicity, political affiliations, religious convictions, membership of a union, your health or sex life or criminal history. If such information becomes relevant as part of the application process, you will be specifically asked for it and be given the opportunity to consent to the processing of these sensitive data separately.

## 3. WHY WE NEED YOUR DATA

We process your personal data to allow you to apply for employment with us and to allow us to process, assess and decide on your application. We also process your personal data in order for you to receive relevant and personalised information regarding future opportunities for employment within A&P Group. We process your personal data in order for us to be able to defend ourselves in case of a dispute regarding your application (such as related to our refusal of your application). If an application process for a particular position with us leads to a successful outcome, the personal data you provided may be used for human resources purposes for all aspects relating to your employment with us.



# 4. WHAT WE DO WITH IT

Your personal data is controlled and processed by A&P for the performance of its' duties in relation to your employment. This will include some data being accessed by your line managers where necessary. Hosting and storage of your data takes place on our secure A&P Group IT system. Some hard copy (paper based) information may also be held securely in the HR/Recruitment department.

We will only pass your data on to third-parties as necessary to comply with our legal obligations and contractual duties (this could include situations such as passing pay data to HMRC for tax purposes and to providers of your contractual benefits such as pension), or where it is necessary in our legitimate interest (e.g. to an IT service provider for maintenance of our IT systems)

#### 5. HOW LONG WE KEEP IT

We will only keep your application/CV on file for a period of 12 months. After this period, your personal data will be irreversibly destroyed

## 6. WHAT ARE YOUR RIGHTS?

Should you believe that any personal data we hold on you is incorrect or incomplete you have the ability to request to have it rectified or deleted. Please contact us through the Data Subject Access Request process.

Right to erasure – this is also known as the 'right to be forgotten'. You can request that the organisation removes all of your personal data. This is not, however, an absolute right. The organisation can retain your data should they have a legal reason for doing so. If you ask A&P Group to erase your data, we may ask you whether you just want to be marked as 'unavailable' or 'not interested' for a period of time OR whether you want to be permanently deleted

We cannot retain a list of people who have requested permanent deletion, therefore you may still be contacted at a later stage if you remain actively involved in job boards or social media.

A&P are required to keep certain records, such as ID, right to work checks, payroll records, health surveillance or training awards, for certain periods of time. These obligations will override any request to erase data or any objections to processing, for so long as we are required to keep the data

Direct marketing – In registering your details for future vacancies or applying for a position within A&P Group you are consenting to receiving direct marketing for recruitment specific purposes. You reserve the right to unsubscribe from direct marketing links at any time. You can do this by contacting the team on 'labour@ap-group.co.uk'. An organisation MUST have your express consent to send you direct marketing. Therefore, if A&P launches any further services other than recruitment or training, we must have your permission to send you information about it.

In the event that you wish to complain about how we have handled your personal data, please contact the A&P Senior HR Manager (SHRM) by email or in writing. The SHRM will then look into your complaint and work with you to resolve the matter.

If you still feel that your personal data has not been handled appropriately according to the law, you can contact Information Commissioner's Office in UK and file a complaint with them.