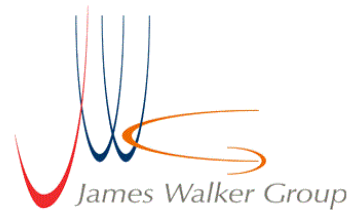


General Data Protection Regulation

Privacy Notice (Recruitment)



This notice explains what personal data (information) we will hold about you, how we collect it, and how we will use and may share information about you during the application process. As a business we are required to notify you of this information, under Data Protection Legislation.

Can you please ensure that you read this notice (sometimes referred to as a 'Privacy Notice') and any other similar notice we may provide to you from time to time when we collect or process personal information about you.

Who collects the information

James Walker Group Limited ('Company') is a 'data controller' and gathers and uses certain information about you. This information may be gathered and used by our affiliated entities and group companies, namely (our 'group companies') and so, in this notice, references to 'we' or 'us' mean the Company and our group companies. Details of our group companies are listed in our Annual Report and Accounts or may be obtained from the Group Company Secretary.

Data protection principles

We will comply with the data protection principles when gathering and using personal information, as set out in our Data Protection Policy.

About the information we collect and hold

The table set out in Part A of the Schedule below (page 3) summarises the information we collect and hold up to and including the shortlisting stage of the recruitment process, how and why we do so, how we use it and with whom it may be shared.

The table in Part B of the Schedule below summarises the additional information we collect before making a final decision to recruit, ie before making an offer of employment unconditional, how and why we do so, how we use it and with whom it may be shared.

We seek to ensure that our information collection and processing is always proportionate. We will notify you of any changes to information we collect or to the purposes for which we collect and process it.

Where information may be held

Information may be held at our offices and those of our group companies, and third party agencies, (for example recruitment consultants).

How long we keep your information

We keep the personal information that we obtain about you during the recruitment process for no longer than is necessary for the purposes for which it is processed. How long we keep your information will depend on whether your application is successful and you become employed by us, the nature of the information concerned and the purposes for which it is processed.

We will keep recruitment information (including interview notes) for no longer than six months, taking into account the limitation periods for potential claims such as race or sex discrimination (as extended to take account of early conciliation), after which they will be destroyed. If there is a clear business reason for keeping recruitment records for longer than the recruitment period, we may do so but will first consider whether the records can be pseudonymised, and the longer period for which they will be kept.

If your application is successful, we will keep only the recruitment information that is necessary in relation to your employment. For further information, see our data protection privacy notice employment.

Further details on our approach to information retention and destruction are available in our document retention policy.

Your rights to correct and access your information and to ask for it to be erased

Please contact the Human Resource Department, who can be contacted at jim.hare@jameswalker.biz or on 01483 746 146 if (in accordance with applicable law) you would like to correct or request access to information that we hold relating to you or if you have any questions about this notice. You also have the right to ask the Human Resource Department for some but not all of the information we hold and process to be erased (the 'right to be forgotten') in certain circumstances. The Human Resource Department will provide you with further information about the right to be forgotten, if you ask for it.

Keeping your personal information secure

We have appropriate security measures in place to prevent personal information from being accidentally lost, or used or accessed in an unauthorised way. We limit access to your personal information to those who have a genuine business need to know it. Those processing your information will do so only in an authorised manner and are subject to a duty of confidentiality.

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

Transferring your personal information

We may transfer personal information outside the European Economic Area (EEA) (which comprises the countries in the European Union and Iceland, Liechtenstein and Norway) on the basis that (a) that country, territory or organisation is designated as having an adequate level of protection, (b) that the organisation receiving the information has provided adequate safeguards by way of standard data protection clauses or (c) by way of compliance with an approved code of conduct. Such transfer may for example relate to potential redeployment or by a service provider (eg payroll).

If we need to transfer your data within the EU, we will firstly ensure that the recipient has the appropriate safeguards.

How to complain

We hope that the Group Company Secretary can resolve any query or concern you raise about our use of your information. If not, contact the Information Commissioner at <https://ico.org.uk/concerns/> or telephone: 0303 123 1113 for further information about your rights and how to make a formal complaint.

THE SCHEDULE - ABOUT THE INFORMATION WE MAY COLLECT AND HOLD

Part A

Up to and including the shortlisting stage

The information we MAY collect	How we collect the information	Why we collect the information	How we use and may share the information
Your name and contact details (ie address, home and mobile phone numbers, email address)	From you	Performance of a contract: the processing is necessary in order to take steps at the request of the data subject (you) prior to entering into a contract (a contract of employment)	To enable HR personnel or the manager of the relevant department to contact you to progress your application, arrange interviews and inform you of the outcome To inform the relevant manager or department of your application
Details of your qualifications, experience, employment history (including job titles, salary and working hours and interests)	From you, in the submitted CV and interview notes	Performance of a contract: the processing is necessary in order to take steps at the request of the data subject (you) prior to entering into a contract (a contract of employment)	To make an informed recruitment decision The person making the shortlisting decision will receive pseudonymised or anonymised details only; if you are invited for interview, the interviewer will receive non-anonymised details
Your name, contact details and details of your qualifications, experience, employment history and interest	From you, in the completed application form and interview notes (if relevant)	Performance of a contract: the processing is necessary in order to take steps at the request of the data subject (you) prior to entering into a contract (a contract of employment)	To see whether an associated company has any suitable vacancies
Your racial or ethnic origin, sex and sexual orientation, religious or similar beliefs	From you, in a completed anonymised equal opportunities monitoring form	To comply with our legal obligations and for reasons of substantial public interest (equality of opportunity or treatment)	To comply with our equal opportunities monitoring obligations and to follow our equality and other policies For further information, see ** below

Information regarding your criminal record	From you, in your completed application form	Performance of a contract: the processing is necessary in order to take steps at the request of the data subject (you) prior to entering into a contract (a contract of employment)	To make an informed recruitment decision To carry out statutory checks Information shared with DBS and other regulatory authorities as required For further information, see * below
Details of your referees	From you in your submitted CV	Performance of a contract: the processing is necessary in order to take steps at the request of the data subject (you) prior to entering into a contract (a contract of employment)	To carry out a fair recruitment process To comply with legal/regulatory obligations Information shared with relevant managers, HR personnel and the referee

Part B
Before making a final decision to recruit

The information we collect	How we collect the information	Why we collect the information	How we use and may share the information
Information about your previous academic and/or employment history, including details of any conduct, grievance or performance issues, appraisals, time and attendance, from references obtained about you from previous employers and/or education providers *	From your referees (details of whom you will have provided)	Performance of a contract: the processing is necessary in order to take steps at the request of the data subject (you) prior to entering into a contract (a contract of employment)	To obtain the relevant reference about you To comply with legal/regulatory obligations Information shared with relevant managers and HR personnel
Information regarding your academic and professional qualifications *	From you, from your education provider, from the relevant professional body	Performance of a contract: the processing is necessary in order to take steps at the request of the data subject (you) prior to entering into a contract (a contract of employment)	To make an informed recruitment decision

<p>Information/Results from Psychometric Tests asked to undertake as part of the recruitment process***</p>	<p>From the relevant body who administer tests on behalf of the business</p>	<p>Performance of a contract: the processing is necessary in order to take steps at the request of the data subject (you) prior to entering into a contract (a contract of employment)</p>	<p>To make an informed recruitment decision</p> <p>Information shared with relevant managers & HR personnel</p>
<p>Information regarding your criminal record, in criminal records certificates (CRCs) and enhanced criminal records certificates (ECRCs) *</p>	<p>From you and from the Disclosure and Barring Service (DBS)</p>	<p>Performance of a contract: the processing is necessary in order to take steps at the request of the data subject (you) prior to entering into a contract (a contract of employment)</p>	<p>To make an informed recruitment decision</p> <p>To carry out statutory checks</p> <p>Information shared with DBS and other regulatory authorities as required</p> <p>For further information, see ** below</p>
<p>Your nationality and immigration status and information from related documents, such as your passport or other identification and immigration information *</p>	<p>From you and, where necessary, the Home Office</p>	<p>Performance of a contract: the processing is necessary in order to take steps at the request of the data subject (you) prior to entering into a contract (a contract of employment)</p> <p>To comply with our legal obligations</p>	<p>To carry out right to work checks</p> <p>Information may be shared with the Home Office</p>
<p>A copy of your driving licence *</p>	<p>From you</p>	<p>Performance of a contract: the processing is necessary in order to take steps at the request of the data subject (you) prior to entering into a contract (a contract of employment)</p> <p>To comply with our legal obligations</p> <p>To comply with the terms of our insurance</p>	<p>To make an informed recruitment decision</p> <p>To ensure that you have a clean driving licence</p> <p>Information may be shared with our insurer</p>

You are required by law or in order to enter into your contract of employment to provide the categories of information marked ‘*’ above to us to enable us to verify your right to work in the UK and your suitability for the position.

** Further details on how we handle sensitive personal information can be obtained by the Human Resource Department.

*** If the psychometric testing involves automated decision making this will be made clear in the email you receive inviting you to take the test. If you are unsuccessful in your application as a result of automated decision making you have the right to challenge and request a review of the decision. Please contact the person who sent the test link to you.