

UK GDPR CANDIDATE PRIVACY NOTICE

WHAT IS THE PURPOSE OF THIS DOCUMENT?

The Camlin group of companies ("Camlin Group") is a "controller" in relation to personal data. This means that we are responsible for deciding how we hold and use personal information about you. You are being sent a copy of this privacy notice because you are applying for work with us (whether as an employee, worker or contractor). It makes you aware of how and why your personal data will be used, namely for the purposes of the recruitment exercise, and how long it will usually be retained for. It provides you with certain information that must be provided under the UK General Data Protection Regulation (UK GDPR).

DATA PROTECTION PRINCIPLES

We will comply with data protection law. This says that the personal information we hold about you must be:

- 1. Used lawfully, fairly and in a transparent way.
- 2. Collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes.
- 3. Relevant to the purposes we have told you about and limited only to those purposes.
- 4. Accurate and kept up to date.
- 5. Kept only as long as necessary for the purposes we have told you about.
- 6. Kept securely.

THE KIND OF INFORMATION WE HOLD ABOUT YOU

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

- The information you have provided to us in your curriculum vitae and covering letter.
- The information you have provided on our application form, including name, title, address, telephone number, personal email address, date of birth, gender, employment history, qualifications.
- Any information you provide to us during an interview.
- Any relevant assessments completed during the selection process including technical and personality-based tests.









We may also collect, store and use the following types of more sensitive personal information:

- Information about your race or ethnicity, religious beliefs, sexual orientation and political opinions.
- Information about your health, including any medical condition, health and sickness records.
- Information about criminal convictions and offences.

HOW IS YOUR PERSONAL INFORMATION COLLECTED?

We collect personal information about candidates from the following sources:

- You, the candidate.
- Recruitment agencies, from which we collect the following categories of data: including name, title, address, telephone number, personal email address, date of birth, gender, employment history, qualifications.
- Experian, a background check provider.
- Credit reference agencies (as and when required), from which we MAY collect the following categories of data: basic credit history data.
- AccessNI in respect of criminal convictions.
- Your named referees, from whom we collect information pertaining to your work history and experience.
- Social Media sites/platforms, such as LinkedIn

HOW WILL WE USE INFORMATION ABOUT YOU?

We will use the personal information we collect about you to:

- Assess your skills, qualifications, and suitability for the work/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.
- To monitor the diversity of candidates who apply to work with us.
- To contact you in future if a similar vacancy comes up within 6 months of us concluding the recruitment process.

It is in our legitimate interests to decide whether to appoint you to the role since it would be beneficial to our business to appoint someone to that role.





•



We also need to process your personal information to decide whether to enter into a contract of employment or consultancy agreement with you.

Having received your CV and covering letter OR your application form, we will then process that information to decide whether you meet the basic requirements to be shortlisted for the role. If you do, we will decide whether your application is strong enough to invite you for an interview. If we decide to call you for an interview, we will use the information you provide to us at the interview to decide whether to offer you the role OR work. If we decide to offer you the role OR work, we will then take up references AND/OR carry out a criminal record AND/OR carry out additional checks before confirming your appointment.

IF YOU FAIL TO PROVIDE PERSONAL INFORMATION

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

HOW WE USE PARTICULARLY SENSITIVE INFORMATION

We will use your particularly sensitive personal 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 beliefs, to ensure meaningful equal opportunity monitoring and reporting.
- If you are successful in your application to join us, we will also collect information about unspent criminal convictions revealed by a basic criminal records check.

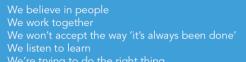
INFORMATION ABOUT CRIMINAL CONVICTIONS

We envisage that we will process information about criminal convictions.

We will collect information about your criminal convictions history if we would like to offer you the work OR role (conditional on checks and any other conditions, such as references, being satisfactory). We are entitled to carry out a criminal records check in order to satisfy ourselves that there is nothing in your criminal convictions history which makes you unsuitable for the role. In particular:









• Where the role OR work requires a high degree of trust and integrity and so we would like to ask you to seek a basic disclosure of your criminal records history.

We have in place an appropriate policy document and safeguards which we are required by law to maintain when processing such data.

AUTOMATED DECISION MAKING

You will not be subject to decisions that will have a significant impact on you based solely on automated decision-making.

DATA SHARING

WHY MIGHT YOU SHARE MY PERSONAL INFORMATION WITH THIRD PARTIES?

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

- Recruitment agency
- Psychometric testing providers where you are required to take an assessment for the role
- Background check provider
- Your named referees

All our third-party service providers 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 and have a duty of confidentiality.

DATA SECURITY

We have put in place appropriate security measures 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 have a business need-to-know. They will only process your personal information on our instructions and they are subject to a duty of confidentiality. Details of these measures may be obtained from the Information Security Manager.





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

DATA RETENTION

HOW LONG WILL YOU USE MY INFORMATION FOR?

If your application is successful, personal information you have provided during the application process will be kept in your employee file for the duration of your employment plus 6 years following the end of your employment.

If your application is unsuccessful, we will retain your personal information for a period of 12 months after we have communicated to you our decision about whether to appoint you to the role OR work. We retain your personal information 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. After this period, we will securely destroy your personal information in accordance with our data retention policy OR applicable laws and regulations.

If we wish to retain your personal information on file, on the basis that a further opportunity may arise in future and we may wish to consider you for that, we will write to you separately, seeking your explicit consent to retain your personal information for a fixed period on that basis. Background check documents including credit reports, criminal record checks retained by our background check provider(s) and will be securely destroyed by them 2 years from the date they carried out the relevant check.

RIGHTS OF ACCESS, CORRECTION, ERASURE AND RESTRICTION

YOUR RIGHTS IN CONNECTION WITH PERSONAL INFORMATION

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

- Request access to your personal information (commonly known as a "data subject access request"). This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it.
- Request correction of the personal information that we hold about you. This
 enables you to have any incomplete or inaccurate information we hold about
 you corrected.







- Request erasure of your personal information. This enables you to ask us to delete or remove personal information 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 information where you have exercised your right to object to processing (see below).
- Object to processing of your personal information where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground.
- Request the restriction of processing of your personal information. This
 enables you to ask us to suspend the processing of personal information
 about you, for example if you want us to establish its accuracy or the reason
 for processing it.
- Request the transfer of your personal information to another party.

If you want to review, verify, correct or request erasure of your personal information, object to the processing of your personal data, or request that we transfer a copy of your personal information to another party, please contact Information Security Manager in writing.

RIGHT TO WITHDRAW CONSENT

When you applied for this role, you provided consent to us processing your personal information for the purposes of the recruitment exercise. You have the right to withdraw your consent for processing for that purpose at any time. To withdraw your consent, please contact the Information Security Manager. 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.

INFORMATION SECURITY MANAGER

We have appointed an Information Security Manager to oversee compliance with this privacy notice. If you have any questions about this privacy notice or how we handle your personal information, please contact the Information Security Manager. Email address: informationsecurity@camlingroup.com

Postal address: 31 Ferguson Drive, Knockmore Hill Industrial Park, Lisburn, BT28 2EX

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO) who is responsible for data protection issues in the UK.





Document	63-0252-01	Classification	Open
Reference			
Version	Date	Revision Author	Summary of Changes
01	11/03/2022	Ashleigh Brimacombe	Creation
01	31/08/2022	Ashleigh Brimacombe	Reviewed
01	23/09/2022	Alexandra Kyle	Reviewed
01	24/10/2022	Denise Thorn	Reviewed
01	08/11/2023	Clare McLaughlin	Reviewed (one minor
			change)
01	09/11/2023	Ashleigh Brimacombe	Reviewed
01	05/09/2024	Kerry Calvert	Reviewed (minor changes)
01	26/9/25	Kerry Calvert	Reviewed
Name	Position	Signature	Date
Nuala McDonald	Chief People Officer	Muslo Neworold	26/9/25

