

## **iLUKA HOLDINGS LTD AND ITS SUBSIDIARIES RECRUITMENT PRIVACY POLICY SEPTEMBER 2020**

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### **SCOPE OF RECRUITMENT PRIVACY NOTICE**

As part of our recruitment process, iLUKA Holdings Ltd and its Subsidiaries (“iLUKA”) collects and processes personal data relating to those who apply to work for us. By agreeing to the terms of this notice as part of your application and sharing your personal information with us, and by continuing to use the iLUKA sites or send your details by email or Social Media, you confirm that you have read and understood the terms of this privacy notice. We are committed to being transparent about how we collect and use that data and meeting our data protection obligations.

### **YOUR PERSONAL DATA – WHAT WE HOLD AND WHAT WE DO WITH IT**

The information we collect about you during the recruitment process may include:

- Your name, address and contact details, including email address and telephone number;
- Details of your qualifications, skills, experience and employment history;
- Information about your current level of remuneration, including benefit entitlements;
- Whether or not you have a disability for which iLUKA needs to make reasonable adjustments during the recruitment process;
- Information about your entitlement to work in the UK; and
- Special categories of data for equal opportunities monitoring, such as information about your ethnic origin.

In addition, depending on the opportunity or an individual’s circumstances, we may be required to obtain information concerning past criminal convictions and to carry out financial probity checks.

We need to process personal data to aid our recruitment processes and also to enter into a contract with successful candidates.

In some cases, we need to process data to ensure that we are complying with our legal obligations such as checking a successful candidate’s eligibility to work for iLUKA before employment starts.

We have a legitimate interest in processing personal data during the recruitment process and for keeping records of the process. Processing your data allows us to manage the recruitment process, assess and confirm suitability for employment and decide to whom to offer a job. We may also need to process data from candidates to respond to and defend against legal claims.

We may process special categories of data, such as information about ethnic origin, sexual orientation or religion or belief, to monitor recruitment statistics. We may also collect information about whether or not candidates are disabled to make reasonable adjustments for candidates who have a disability. iLUKA processes such information to carry out its obligations and exercise specific rights in relation to employment.

For some roles, iLUKA is obliged to seek information about criminal convictions and offences or financial history. Where iLUKA seeks this information, it does so because it is necessary for it to carry out its obligations and exercise specific rights in relation to employment.

If your application is unsuccessful, iLUKA may keep your personal data on file in case there are future employment opportunities for which you may be suited. iLUKA may keep your data for this purpose and you are free to withdraw your consent at any time.

If you have asked us to keep in touch or set up Job Alerts to keep you informed of other opportunities at iLUKA, we may periodically contact you to tell you about these. We do this in various ways, including e-mail, SMS, via social media platforms and by phone. You have the option to opt out of these notifications at any point either by following the relevant link in the communication you've received, by email to [teamhr@ilukacollective.com](mailto:teamhr@ilukacollective.com) or through the profile you've created on our websites.

## **WHERE THE DATA COMES FROM AND WHO GETS TO SEE IT**

We collect information about you for use during recruitment in a variety of ways. For example, some of it comes from you via application forms, CVs or resumes and identity documents you submit. Other data is collected through interviews or other forms of assessment. The information about you may also come to us via a recruitment agency.

We may also collect personal data about you from third parties, such as references supplied by former employers, information from employment background check providers and information from criminal records checks. We will seek information from third parties only once a job offer to you has been made and will inform you that we are doing so.

Data will be stored in a range of different places, including on your application record, in physical files, on iLUKA people management systems, and on other IT systems (including email).

Your information may be shared internally for the purposes of recruitment processes. This includes members of the HR team, interviewers involved in the recruitment process, managers in the division and IT staff if access to the data is necessary for the performance of their roles. We may transfer your personal data outside the EEA to our Subsidiaries where this is necessary for the recruitment process. We will ensure that the transfer is lawful and that there are appropriate security arrangements.

iLUKA will not share your data with third parties, unless your application for employment is successful and it makes you an offer of employment. We may then share your data with former employers to obtain references for you, employment background check providers to obtain necessary background checks and the Disclosure and Barring Service to obtain necessary criminal records checks.

## **HOW LONG DO WE KEEP YOUR PERSONAL DATA**

If your application for employment is unsuccessful, we will hold your data on file for a further 12 months after the end of the relevant recruitment process for consideration for future employment opportunities. At the end of that period or once you withdraw your consent, your data is deleted.

If your application for employment is successful, personal data gathered during the recruitment process will be transferred to your personnel file and retained during your employment.

## **WHAT IF YOU DO NOT PROVIDE PERSONAL DATA**

You are under no statutory or contractual obligation to provide data to us during the recruitment process. However, if you do not provide the information, we may not be able to process your application properly or at all.

## ACCESS TO YOUR PERSONAL DATA AND RIGHTS

As a data subject, you have a number of rights. You can:

- Access and obtain a copy of your data on request;
- Require iLUKA to change incorrect or incomplete data;
- Require iLUKA to delete or stop processing your data, for example where the data is no longer necessary processing; and
- Object to the processing of your data where iLUKA is relying on its legitimate interests as the legal ground for processing.

If you would like to exercise any of these rights, please use the contact details below. If you believe that iLUKA has not complied with your data protection rights, you can complain to the Information Commissioner.

## CONTACT DETAILS

In processing your personal data for the purposes of recruitment, we act as a data controller. If you have any questions about this notice, please contact [teamhr@ilukacollective.com](mailto:teamhr@ilukacollective.com)