APPLICANT PRIVACY POLICY

What is the purpose of this document?

Verastar Limited t/a Clear Business (Clear Business) is a "data controller". 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 General Data Protection Regulation (*(EU) 2016/679*) (GDPR).

Data protection principles

We will comply with data protection law and principles, which means that your data will be:

- Used lawfully, fairly and in a transparent way.
- Collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes.
- Relevant to the purposes we have told you about and limited only to those purposes.
- Accurate and kept up to date.
- Kept only as long as necessary for the purposes we have told you about.
- 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 (CV) and covering letter.
- The information you have provided on our application form, including name, title, address, telephone number, personal email address, employment history, qualifications.
- Any information you provide to us during an interview.
- Any information obtained from the skills tests completed during the interview process.
- We may also collect, store and use the following "special categories" of more sensitive personal information:
    - 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 or job boards, from which we collect the following categories of data:
    - Name, title, address, telephone number, personal email address, employment history, qualifications.
    - The information in your curriculum vitae and covering letter.
- Your named referees.
- Publicly accessible sources:
    - Social media.

How we will use information about you

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

- Assess your skills, qualifications, and suitability for the 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.

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 with you.

Having received your CV and covering letter and/or your application form and the results from our applicant tests, 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. If we decide to offer you the role, we will then take up references and request information about relevant criminal convictions 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.

Information about criminal convictions

We envisage that we will process information about criminal convictions.

We will collect information about your criminal convictions history during the application process. We are entitled to do so in order to satisfy ourselves that there is nothing in your criminal convictions history which makes you unsuitable for the role. In particular:

- Employees of Clear Business are required to act with a high degree of trust and integrity and so we would like to ask you some brief questions about 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.

AI & Automated decision-making

We may use automated systems and tools to support certain business processes, such as in our communications to you, recruitment administration, applicant tracking, facilitating IT operations and system security, reporting and business insights, knowledge management, and applicant support services.

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: entities within the Clear Business group, applicant tracking system providers, recruitment consultants/agencies, job board providers. All our third-party service providers and other entities in the Clear Business 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.

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 our Data Protection Officer.

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?

We will retain your personal information for a period of 9 months after we have communicated to you our decision about whether to appoint you to the role. 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. It also means that if you are initially unsuccessful we can reconsider your application

if the same role becomes available again within this period. After this period, we will securely destroy your personal information in accordance with our data retention policy.

If we wish to retain your personal information on file, on the basis that a different opportunity may arise in future and we may wish to consider you for that, we will seek your explicit consent to retain your personal information for a fixed period on that basis.

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. You also have the right to object where we are processing your personal information for direct marketing purposes.
- **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 dataprotection@clearbusiness.co.uk. If you register with our application system, you can access your profile, correct and update your personal information or withdraw your personal information at any time.

Legal basis for processing

We have a legitimate interest in processing personal data during the recruitment process. Processing your personal data allows us to manage the recruitment process, assess and confirm your suitability for employment and decide to whom we offer a job. If you wish to object to this processing, please contact our Data Protection Officer. Once we have received notification that you have objected to the processing we will no longer process your application and, subject to our retention policy, we will dispose of your personal data securely.

When we process information about criminal convictions, we do so to carry out our obligations in connection with employment or for reasons of substantial public interest and in line with our Employment Suitability Checks policy.

Data Protection Officer

We have appointed a Data Protection Officer (DPO) 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 DPO at dataprotection@clearbusiness.co.uk.

You have the right to make a complaint to us if you believe that: (a) there has been a breach of your rights under data protection laws, and/or (b) we are otherwise in breach of data protection laws. You may raise a complaint to us by emailing dataprotection@clearbusiness.co.uk

You have the right to make a complaint at any time to the Information Commission (ICO), the UK supervisory authority for data protection issues.