

# Candidate Privacy Notice

December 2022

### Document Version Control

Document Name:	essensys Plc – Candidate Privacy Notice
Document Status:	Issued
Version Number:	1
Date:	7th December 2022
Owner:	Kally Kang-Kersey – Chief People Officer
Approved by:	Board
Next Review Date:	December 2023

### Change History

Version	Issue Date	Author	Details
1.0	7th December 2022	Kally Kang-Kersey	First issue of document
2.0			
3.0			
4.0			

## Contents

Applicability	4
The legal framework	4

## Applicability

essensys PLC having its registered office address at Aldgate Tower, Leman Street, London, E1 8FA, and its group companies ("essensys") is committed to conducting its business lawfully, ethically and with integrity at all times wherever it operates around the world.

References to 'essensys' within this notice are to essensys PLC or the relevant group entity within its group of companies that has been notified to you as Controller of your personal data.

## The legal framework

essensys is a "controller" in relation to your 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") and/or European Union General Data Protection Regulation ("EU GDPR") where this is applicable.

### 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, and personal email address.
- Any information you provide to us during an interview.
- Any information you provide in assessments during the interview process.

### 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: name, contact information, qualifications, and employment history.

- Relevant background check agencies or other company employees who have interviewed you.
- Your named referees, from whom we collect the following categories of data: name, details of your employment including, dates of employment, salary, duties, ability assessment and disciplinary actions if applicable.
- Our online application tracking system, Talos 360.

## **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 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 any other information provided in respect of you, 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 before confirming your appointment.

## **Failure 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 a credit check or references for the role and you fail to provide us with relevant details, we will not be able to take your application further.

## **International transfers of your information**

essensys plc is located in the UK but we use service providers in other countries, and we are a part of a group of companies located in different parts of the world.

We may therefore transfer your personal information out of the UK. Although some countries might not have the same level of protection for personal data as the UK, whenever we send your personal data to a country that does not have an adequate level of data protection, we will take all necessary steps to ensure that the data is protected and processed safely. You can obtain a copy of the safeguards implemented for international transfers of personal data by making a request via email at [DPO@essensys.tech](mailto:DPO@essensys.tech) or via post to our registered office address at Aldgate Tower, Leman Street, London, E1 8FA.

Where appropriate we will implement International Data Transfer Agreement (IDTA) or the UK Addendum to the European Union Standard Contractual Clauses (SCCs) when we transfer data from UK to a non-adequate third countries. Similarly, when we transfer data from European Economic Area (EEA) to a non-adequate third country, we will implement SCCs approved by the European Union.

### **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: Brookfield Asset Management Inc., Credence Background Screening Limited and 360 Resourcing Solutions Limited.

We ensure that our third-party service providers and other entities in the group provide sufficient guarantees to implement appropriate technical and organizational measures in a manner that the processing of your data meets the requirements of EU GDPR and to ensure the protection of the rights of the data subject.

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 only to people who are involved in the recruitment process only. 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 by emailing [DPO@essensys.tech](mailto:DPO@essensys.tech)

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 6 (six) months after we have communicated to you our decision about whether to appoint you to a 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. After this period, we will securely destroy your personal information in accordance with our data retention policy and/or applicable laws and regulations.

In the event that 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.

## 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 the 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 portability** of your personal information to another party.

If you want to review, verify, correct, restrict 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 [DPO@essensys.tech](mailto:DPO@essensys.tech) 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 [DPO@essensys.tech](mailto:DPO@essensys.tech). 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.

### 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 [DPO@essensys.tech](mailto:DPO@essensys.tech) or via post to our registered office address at Aldgate Tower, Leman Street, London, E1 8FA. 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.