

GDPR Candidate privacy notice direct applicant (UK)

Key Details

Policy became operational on:	25 May 2018
Next Review date:	18 September 2018
Version	v1.1

What is the purpose of this document?

- 1.1 Steer 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

- 1.2 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

- 1.3 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 as part of your application, including name, title, address, telephone number, personal email address, employment history, qualifications and right to work in the UK status.
 - Any information you provide to us during an interview.
 - Any test results from any testing or exercises undertaken as part of the selection process.
- 1.4 We may also collect, store and use the following “Special Categories” of more sensitive personal information:
- Information about your gender or race.

- Information about your health, including any medical condition.

How is your personal information collected?

1.5 We collect personal information about candidates from the following sources:

- You, the candidate.
- Your named referees, from whom we collect the following categories of data: dates of employment and position(s) held.

How we will use information about you

1.6 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.

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

1.8 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 application, and any tests which have been administered in advance of interview, 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 and any the results of any test administered during 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.

If you fail to provide personal information

1.9 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 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 personal information

1.10 Special Categories of particularly sensitive personal information require higher levels of protection. We need to have further justification for collecting, storing and using this type of personal information. We have in place policies and safeguards which apply when we are processing such data. We may process special categories of personal information in the following circumstances:

- 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, philosophical or moral beliefs, or your sexual life or sexual orientation, to ensure meaningful equal opportunity monitoring and reporting.

Data sharing

Why might you share my personal information with third parties?

- 1.11 We will only share your personal information with the following third parties for the purposes of processing your application: your information may be sent to an overseas office in the limited circumstance that an individual there will be part of the hiring process, and for an HR employee in other entities where necessary to carry out HR work in respect of our entities in the UK and Italy. All our third-party service providers and other entities in the 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.
- 1.12 To ensure that your personal information does receive an adequate level of protection we have put in place the following appropriate measure to ensure that your personal information is treated by those third parties in a way that is consistent with and which respects the EU and UK laws on data protection: we use specific contracts approved by the European Commission which give personal data the same protection it has in Europe.

Data security

- 1.13 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, details of which can be found in our Data Security Policy and Acceptable Use Policy. 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 Data Privacy Manager.
- 1.14 We have put in place procedures to deal with any suspected data security breach and will notify you in accordance with our policies 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?

- 1.15 We will retain your personal information for a period of six 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. After this period, we will securely destroy your personal information in accordance with our Records Retention policy.

- 1.16 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.

Rights of access, correction, erasure, and restriction

- 1.17 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.
- 1.18 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 the Data Privacy Manager writing.

Right to withdraw consent

- 1.19 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 HR team. 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 Privacy Manager

- 1.20 We have appointed a data privacy 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 Data Privacy Manager via privacy@steergroup.com.

GDPR Candidate privacy notice candidate via recruitment agency (UK)

Key Details

Policy became operational on: 25 May 2018
Next Review date: 18 September 2018

What is the purpose of this document?

- 1.21 Steer 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

- 1.22 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

- 1.23 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 as part of your application, including name, title, address, telephone number, personal email address, employment history, reference details, qualifications and right to work in the UK status.
 - Any information you provide to us during an interview, including interview notes.
 - Any test results from any testing or exercises undertaken as part of the selection process.
- 1.24 We may also collect, store and use the following “Special Categories” of more sensitive personal information:
- Information about your gender.

- Information about your health, including any medical condition.

How is your personal information collected?

1.25 We collect personal information about candidates from the following sources:

- You, the candidate.
- Your recruitment agency, from which we collect the following categories of data: the information you have provided to them in your curriculum vitae, including name, title, address, telephone number, personal email address, employment history and qualifications.
- Your named referees, from whom we collect the following categories of data: dates of employment and position(s) held.

How we will use information about you

1.26 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.

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

1.28 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 application, and any tests which have been administered in advance of interview, 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 and any the results of any test administered during 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.

If you fail to provide personal information

1.29 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 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 personal information

1.30 Special Categories of particularly sensitive personal information require higher levels of protection. We need to have further justification for collecting, storing and using this type of personal information. We have in place policies and safeguards which apply when we are

processing such data. We may process special categories of personal information in the following circumstances:

- 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, philosophical or moral beliefs, or your sexual life or sexual orientation, to ensure meaningful equal opportunity monitoring and reporting.

Data sharing

Why might you share my personal information with third parties?

- 1.31 We will only share your personal information with the following third parties for the purposes of processing your application: your information may be sent to an overseas office in the limited circumstance that an individual there will be part of the hiring process, and for an HR employee in other entities where necessary to carry out HR work in respect of our entities in the UK and Italy. All our third-party service providers and other entities in the 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.
- 1.32 To ensure that your personal information does receive an adequate level of protection we have put in place the following appropriate measure to ensure that your personal information is treated by those third parties in a way that is consistent with and which respects the EU and UK laws on data protection: we use specific contracts approved by the European Commission which give personal data the same protection it has in Europe.

Data security

- 1.33 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, details of which can be found in our Data Security Policy and Acceptable Use Policy. 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 Data Privacy Manager.
- 1.34 We have put in place procedures to deal with any suspected data security breach and will notify you in accordance with our policies 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?

- 1.35 We will retain your personal information for a period of six 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. After this period, we will securely destroy your personal information in accordance with our Records Retention policy.

- 1.36 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.

Rights of access, correction, erasure, and restriction

- 1.37 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.
- 1.38 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 the Data Privacy Manager in writing.

Right to withdraw consent

- 1.39 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 HR team. 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 Privacy Manager

- 1.40 We have appointed a data privacy 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 Data Privacy Manager via privacy@teergroup.com.

GDPR Candidate for Graduate scheme privacy notice (UK)

Key Details

Policy became operational on: 25 May 2018
Next Review date: 18 September 2018

What is the purpose of this document?

- 1.41 Steer 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

- 1.42 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

- 1.43 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 as part of your application, including name, title, address, telephone number, personal email address, employment history, qualifications and right to work in the UK status.
 - Any information you provide to us during an interview.
 - Any test results from any testing or exercises undertaken as part of the selection process.
- 1.44 We may also collect, store and use the following “Special Categories” of more sensitive personal information:
- Information about your gender or race.
 - Information about your health, including any medical condition.

How is your personal information collected?

- 1.45 We collect personal information about candidates from the following sources:

- You, the candidate.
- Your named referees, from whom we collect the following categories of data: dates of employment/ studies and position(s) held/ studies undertaken.

How we will use information about you

1.46 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.

1.47 It is in a legitimate interest to use personal data in the case of recruitment for a business.

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

1.49 Having received your CV and application, and any tests which have been administered in advance of interview, 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 and any the results of any test administered during 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.

If you fail to provide personal information

1.50 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 personal information

1.51 Special Categories of particularly sensitive personal information require higher levels of protection. We need to have further justification for collecting, storing and using this type of personal information. We have in place policies and safeguards which apply when we are processing such data. We may process special categories of personal information in the following circumstances:

- 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, philosophical or moral beliefs, or your sexual life or sexual orientation, to ensure meaningful equal opportunity monitoring and reporting.

Data security

1.52 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, details of which can be found in our Data Security Policy and Acceptable Use Policy. 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 Data Privacy Manager.

- 1.53 We have put in place procedures to deal with any suspected data security breach and will notify you in accordance with our policies 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?

- 1.54 We will retain your personal information for a period of nine 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. After this period, we will securely destroy your personal information in accordance with our Records Retention policy.
- 1.55 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.

Rights of access, correction, erasure, and restriction

- 1.56 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.
- 1.57 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 the Data Privacy Manager in writing.

Right to withdraw consent

- 1.58 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 Early Careers Advisor, **Andy Bisby**. 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 Privacy Manager

- 1.59 We have appointed a data privacy 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 Data Privacy Manager via privacy@steergroup.com.