

## QUADROTECH PRIVACY NOTIFICATION TO JOB APPLICANTS

### Introduction

From 25 May 2018, the European General Data Protection Regulation (GDPR) applies to Quadrotech group companies in the European Union. The GDPR provides for extended information duties. Therefore, in performance of these new legal duties, we inform you of the processing of personal data belonging to you as an applicant for a job vacancy at Quadrotech.

Quadrotech collects and processes personal data relating to job applicants. Quadrotech is committed to being transparent about how it collects and uses that data and to meeting its data protection obligations.

### What information does Quadrotech collect when you apply for a job with us?

Quadrotech collects and processes a range of information about its job applicants. This includes:

- your name, address and contact details, including email address and telephone number;
- details of your qualifications, skills, experience and employment history, including start and end dates, with previous employers and reasons for leaving;
- information about your remuneration, including your current and desired salary and current benefit entitlements;
- information about your entitlement to work in the country of employment;
- information about reasonable adjustments that need to be made during the recruitment process as a result of a disability. This information would only be collected from you if you made Quadrotech aware of the requirement for a reasonable adjustment to be made to the selection process;
- information collected during the selection process such as interview notes from telephone/face to face interviews/psychometric/selection tests.

### What information does Quadrotech collect when you accept a job with us?

- information from a background check related to any criminal record you may have;
- information from a background check on your past employment/education obtained from your nominated referees;

- information about a disability and any reasonable adjustments required (that has been disclosed by you during the selection process);
- information on your right to work in the country you have been offered employment within.

Quadrotech collects this information in a variety of ways. For example, data is collected through: application forms, CVs or resumes; obtained from your passport or other identity documents such as your ID; from forms completed by you at the start of or during employment; from correspondence with you; or through interviews, meetings or other assessments.

In some cases, Quadrotech collects personal data about you from third parties, such as data from psychometric tests conducted as part of the selection procedure, employment references supplied by former employers, information from employment background check providers, information from credit reference agencies and information from criminal records checks permitted by law.

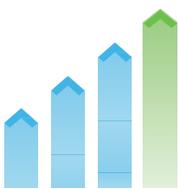
Data is stored in a range of different places, including in your application file within our HR applicant tracking system, in Quadrotech's HR management systems and in other IT systems (including Quadrotech's email system).

## **Why does Quadrotech process personal data?**

Quadrotech needs to process data to process your job application and, for successful applicants, in order to enter into an employment contract with you. For example, it needs to process your data to make a selection decision on the outcome of your application and to communicate the outcome of the decision to you.

In some cases, Quadrotech needs to process data from job applicants to ensure that it is complying with its legal obligations and defend against legal claims. For certain positions, it is necessary to carry out criminal records checks to ensure that individuals are permitted to undertake the role in question. Also, in some countries it is required to check a successful applicant's eligibility to work before employment starts. If a job applicant discloses a disability or a requirement for a reasonable adjustment at the application/interview stage, some special categories of personal data, such as information about health or medical conditions, may be processed to carry out employment law obligations. Where Quadrotech 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.

Quadrotech has a legitimate interest in processing personal data during the recruitment process and for keeping records of the process. Processing data from job applicants allows Quadrotech to:



- manage the recruitment process;
- assess and confirm a candidate's suitability for employment; and
- decide to whom to offer a job;
- communicate with the successful and unsuccessful applicants on the status/outcome of their application;
- hold candidate data on file (provided that the candidate has not requested for their data to be removed) should a suitable opportunity arise within 6 months from the end of the relevant recruitment period

Where Quadrotech relies on legitimate interests as a reason for processing data, it has considered whether or not those interests are overridden by the rights and freedoms of job applicants and has concluded that they are not.

Quadrotech will not use your data for any purpose other than the recruitment exercise for which you have applied.

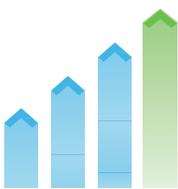
## Who has access to data?

Your information will be shared internally, including with:

- members of the HR and recruitment team;
- shortlisting and interview panel members involved in the recruitment process (this may include external panel members);
- payroll and benefit providers if you are employed by us;
- the recruiting manager/s and other employees involved in the recruitment process;
- IT staff if access to the data is necessary for the performance of their roles.

Quadrotech shares your data with third parties in order to gather data from psychometric profiling, obtain pre-employment references from other employers, obtain employment background checks from third-party providers and obtain necessary criminal records checks (where in line with local law).

Your data may be transferred to countries outside the European Economic Area (EEA) and Switzerland. Personal data is transferred outside the EEA and Switzerland on the basis of declarations of adequacy or other appropriate safeguards, in particular standard data protection clauses adopted by the European Commission. A copy of the specific safeguards applied to the export of your data is available upon request from your employer company's (Article 13 para 1f of the GDPR).



## How does Quadrotech protect data?

Quadrotech takes the security of your data seriously. Quadrotech has internal policies and controls in place to try to ensure that your data is not lost, accidentally destroyed, misused or disclosed, and is not accessed except by its employees or relevant third parties in the performance of their duties.

Where Quadrotech engages third parties to process personal data on its behalf, they do so on the basis of written instructions, are under a duty of confidentiality and are obliged to implement appropriate technical and organisational measures to ensure the security of data.

## For how long does Quadrotech keep data?

If your application for employment is unsuccessful, Quadrotech will hold your personal data on our recruitment system for six months after the end of the relevant recruitment process. However, the two exceptions to this retention period are:

- if you ask us to delete your data before the end of the relevant recruitment process;
- the person appointed to the post is sponsored under the UK's points-based immigration system, when Quadrotech is required to retain the applications of all candidates shortlisted for final interview for 6 months or until UK Visas & Immigration (UKVI) have examined and approved them, whichever is the longer period).

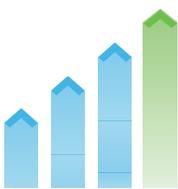
Details of how to request the deletion of your data are provided to you upon your application. If you request for the removal of your data from our systems then we will delete your application and all data (apart from your name and the country in which you reside) from our systems.

If your application for employment is successful, Quadrotech will hold all your data on our e-recruitment and HR system. Personal data gathered during the recruitment process will be transferred to your personnel file (in electronic format), and on HR, Payroll and benefit systems and retained for the duration of your employment.

Wherever possible we will not retain original documents or print-outs and instead will make a note on our central HR and Payroll system that the relevant check or procedure has been completed.

## Your rights

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



- access and obtain a copy of your data on request;
- require Quadrotech to change incorrect or incomplete data;
- require Quadrotech to delete or stop processing your data, for example where the data is no longer necessary for the purposes of processing;
- object to the processing of your data where Quadrotech is relying on its legitimate interests as the legal ground for processing; and
- ask Quadrotech to stop processing data for a period if data is inaccurate or there is a dispute about whether or not your interests override Quadrotech's legitimate grounds for processing data.

If you would like to exercise any of these rights, please contact your employer company's data protection officer ([dpo@quadrotech-it.com](mailto:dpo@quadrotech-it.com)).

If you believe that Quadrotech has not complied with your data protection rights, you can complain to the relevant supervisory authority.

## **What if you do not provide personal data?**

Certain information, such as previous employment details and your contact details, have to be provided to enable Quadrotech to make a decision as to the suitability of your application for the job to which you have applied and communicate the outcome of the decision to you.

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

## **Automated decision-making**

Employment decisions are not based solely on automated decision-making.

