

### **Recruitment Privacy Notice**

Cambridge Weight Plan ("We", "Us", "Our") are committed to protecting and respecting your privacy. This Privacy Notice (together with any other documents referred to herein) sets out the basis on which the personal data collected from you, or that you provide to Us, will be processed by Us in connection with Our recruitment processes. Please read the following carefully to understand Our views and practices regarding your personal data and how We will treat it.

If you register your interest or make a job application with Us, the controller for your personal data will be Cambridge Weight Plan Limited.

Where you apply for a job opening via the application function on a job site or similar online service provider (including through social media platforms such as LinkedIn or Facebook) ("Partner"), you should note that the relevant partner may retain your personal data and may also collect data from Us in respect of the progress of your application. The Partner's Privacy Notice will explain how the Partner will use your data.

#### What information do we collect about you?

We will collect information about you when you register a Candidate Profile and/or Job Alerts, apply for a job vacancy or request further information from us.

There are various ways to apply for a position, which are dependent on the systems applicable to the Cambridge Weight Plan company to which you are applying;

- Submit your CV directly by post or email
- Apply by uploading a file
- Fill in an online form
- Apply using a social media profile (e.g. LinkedIn or Facebook) by giving permission for our service provider (currently Eploy) to access your name, photo, and contact information associated with your account
- Via a recruitment agency or employment business
- In person at interviews

The type of information we may collect includes;

- Name, address, phone number, email address
- Job preferences
- Right to work in the UK
- Pay type (hourly/daily/annually), pay rate or salary
- Details of any pending prosecution and/or unspent criminal convictions
- Work history: employer, position, start and end dates, duties
- Education and/or qualifications
- A record of your progress through any hiring process that we may conduct.
- Details of your visits to Cambridge Weight Plan's careers website including, but not limited to, traffic data, location data, weblogs and other communication



data, the site that referred you to Cambridge Weight Plan's Website and the resources that you access.

We may ask for some sensitive personal information, such as race or ethnic origin, for the purposes of equal opportunities monitoring, or we may ask if you have a disability so we can make necessary adjustments for your interview or job. This information is usually voluntary, and you will be given the opportunity to decide if you want to provide it or not. To the extent you choose to make sensitive personal information available to us, you agree to us processing that information in accordance with this Notice and applicable law.

### **Information We Collect From Other Sources**

Eploy provides Us with the facility to link the data you provide to Us with other publicly available information about you that you have published on the Internet – this may include sources such as LinkedIn and other social media profiles.

We may receive your personal data from a third party who recommends you as a candidate for a specific job opening or for our business more generally.

#### Lawful basis for processing

We rely on legitimate interest as the lawful basis for which We collect and use your personal data. Our legitimate interests are the recruitment of staff for Our business.

Where you apply for a job opening through the Indeed Apply functionality, we rely on your consent, which you can give or withhold during the application process, to disclose your personal data to Indeed on the basis described below.

#### Purposes of processing

We use information held about you in the following ways:

- To consider your application in respect of a role for which you have applied
- To consider your application in respect of other roles
- To communicate with you in respect of the recruitment process
- To enhance any information that we receive from you with information obtained from third party data providers.
- To find appropriate candidates to fill Our job openings.
- Carrying out background checks including, to the extent permitted by law, checking references, qualifications, right to work and criminal records
- Conducting equal opportunities and diversity monitoring
- To contact you for your views on our services
- Notifying you about updates or changes to the site or service whenever necessary
- To provide you with access to Our Employee Stakeholder mobile application if you are successful in your job application.
- Automated decision making/profiling



We may use Eploy's technology to select appropriate candidates for Us to consider based on criteria expressly identified by us, or typical in relation to the role for which you have applied. The process of finding suitable candidates is automatic but any decision as to who We will engage to fill the job opening will be made by Our staff.

We may also use your personal data:

- to meet our internal and external audit requirements, including our information security obligations
- to enforce our terms and conditions
- to protect our rights, privacy, safety, networks, systems, and property, or those of other persons
- for the prevention, detection or investigation of a crime or other breach of law or requirement, loss prevention or fraud
- to comply with requests from courts, law enforcement agencies, regulatory agencies, and other public and government authorities, including where they are outside your country of residence
- in order to exercise our rights, and to defend ourselves from claims and to comply with laws and regulations that apply to us or third parties with whom we work in order to participate in, or be the subject of, any sale, merger, acquisition, restructure, joint venture, assignment, transfer or other disposition of all or any portion of our business, assets or shares (including in connection with any bankruptcy or similar proceedings)

#### **Disclosure of Your Information**

As set out above, we pass your information to our third-party service providers, including Eploy and Actimo, who use it only in accordance with our instructions and as otherwise required by law.

Where you have applied for a job opening through the Indeed Apply functionality, and where you have consented to this disclosure, We will disclose to Indeed certain personal data that We hold, including but not limited to a unique identifier used by Indeed to identify you, and information about your progress through our recruitment process for the applicable job opening, as well as tangible, intangible, visual, electronic, present, or future information that we hold about you, such as your name, contact details and other information involving analysis of data relating to you as an applicant for employment (collectively "Disposition Data"). Indeed's Privacy Notice in respect of Indeed's use of the Disposition Data is available on Indeed's website.

Where you have applied to a job opening through another service provider, we may disclose data similar to the Disposition Data defined above to such service provider. The service provider shall be the data controller of this data and shall therefore be responsible for complying with all applicable law in respect of the use of that data following its transfer by Us.

In addition, we may share your personal data in the following cases:

- Our third-party service providers such as:
  - o those we engage to host and maintain the website and our IT systems



- analytics and search engine service providers that assist us in the improvement and optimisation of our website
- o those who assist us with or partner with us in marketing campaigns
- those we engage to host and maintain our Employee Stakeholder mobile application
- [Credit reference agencies]
- Third parties where we have a duty to or are permitted to disclose your personal information by law (e.g., government agencies, law enforcement, courts, and other public authorities)
- Third parties where reasonably required to protect our rights, users, systems, and services (e.g., legal counsel and information security professionals).

We may, from time to time, expand, reduce, or sell our business, and this may involve the transfer of certain divisions or the whole business to other parties. Personal data relating to you will, where it is relevant to any division so transferred, be transferred along with that division to prospective buyers and the new owner or newly controlling party will, under the terms of this Privacy Notice, be permitted to use personal data relating to you for the purposes.

Before we disclose personal data to a third party, we take steps to ensure that the third party will protect personal data in accordance with applicable privacy laws and in a manner consistent with this Notice. Third parties are required to restrict their use of this personal data to the purpose for which the data was provided.

Sometimes the third party will be outside the UK or European Economic Area (EEA), in which case see below for more information.

### How We store your Personal Data

We take the appropriate measures to ensure that all personal data is kept secure including security measures to prevent personal data from being accidentally lost, or used or accessed in an unauthorised way. We limit access to your personal data to those who have a genuine business need to know it. Those processing your information will do so only in an authorised manner and are subject to a duty of confidentiality.

We also have procedures in place to deal with any suspected data security breach. We will notify you and any applicable regulator of a suspected data security breach where We are legally required to do so.

### Where We store your Personal Data

If you live in the UK or the European Economic Area ("EEA"), the personal data relating to you that We collect may be transferred to, and stored at, locations outside the UK or EEA. For example, as described in this Privacy Notice, the data that we collect from you and process using Eploy's Services may be transferred to, and stored at, a destination outside the UK or the European Economic Area ("EEA"). It may also be processed by



staff operating outside the UK or the EEA who work for us or for one of our suppliers. We may also share personal data relating to you with third parties who are located overseas for business purposes and operational, support and continuity purposes, for example, when We use IT service providers or data storage services.

Countries where personal data relating to you may be stored and/or processed, or where recipients of personal data relating to you may be located, may have data protection laws which differ to the data protection laws in your country of residence. By submitting your personal data, you accept that personal data relating to you may be transferred, stored, or processed in this way. We take measures to ensure that any international transfer of information is managed carefully and in accordance with data protection law to protect your rights and interests and in accordance with this Notice. These measures include:

- Transfers of your personal data to countries which are recognised as providing an adequate level of legal protection for personal data;
- Transfers where We have obtained the specific consent of data subjects to the international transfer of their personal data;
- Transfers to organisations where We are satisfied about their data privacy and security standards and protected by contractual commitments such as signing the Standard Contractual Clauses or an International Data Transfer Agreement (recognised an approved by the EU and UK data protection authorities) and, where available, further assurances such as certification schemes.

If you would like further information, please contact Us (see 'Contact' below).

#### How long we keep your Personal Data

We will hold all the data for as long as you indicate that you are happy for us to do so. If you do not want to be considered for other positions or would like to have your personal information removed, please contact <a href="mailto:recruitment@cwp-uk.com">recruitment@cwp-uk.com</a>.

Unless required for legal purposes or in connection with employment, we will retain your personal data for a maximum of 12 months from the date of submission or the latest update of your details or account information.

If your application is successful, your personal Information will be transferred to your personnel file and retained accordingly. Your information may be retained for a longer period if there are valid legal grounds for us to do so, for example if required by law or a court order, or as needed to defend or pursue legal claims.

### Your rights

Under the General Data Protection Regulation and the UK GDPR, you have several important rights free of charge except in limited cases. In summary, those include rights to:

 access to your personal data and to certain other supplementary information that this Privacy Notice is already designed to address



- the rectification of any mistakes in your information which We hold
- require the erasure of personal data concerning you in certain situations
- receive the personal data concerning you which you have provided to Us, in a structured, commonly used, and machine-readable format and have the right to transmit that data to a third party in certain situations
- object at any time to processing of personal data concerning you for direct marketing
- object to decisions being taken by automated means which produce legal effects concerning you or similarly significantly affect you
- object in certain other situations to our continued processing of your personal data
- otherwise restrict our processing of your personal data in certain circumstances
- claim compensation for damages caused by our breach of any data protection laws.

Where We rely on our legitimate interests to obtain and use your personal data then you have the right to object if you believe your fundamental rights and freedoms outweigh our legitimate interests. Where processing is carried out based upon your consent, you have the right to withdraw that consent at anytime

Your ability to exercise these rights will depend on a number of factors and in some instances, We will not be able to comply with your request for example, but not limited to, because we have legitimate grounds for not doing so or where the right does not apply to the particular data we hold on you.

You should note that if you exercise certain of these rights, We may be unable to continue to provide some or all of our services to you (for example where the personal data is required by us to comply with a statutory requirement).

We ask that you contact us to update or correct your information if it changes or if the personal data We hold about you is inaccurate.

For further information on each of those rights, including the circumstances in which they apply, see the Guidance from the UK Information Commissioner's Office (ICO) on individuals' rights under the UK GDPR.

If you would like to exercise any of the rights mentioned, please contact us by emailing <a href="mailto:recruitment@cwp-uk.com">recruitment@cwp-uk.com</a> and please include the following information:

- enough information to identify you,
- proof of your identity and address, and
- advise us of the information to which your request relates

If you are not satisfied with our use of your personal information or our response to any request made by you in relation to your personal information, you have a right to make a complaint to the Information Commissioner:

Wycliffe House Water Lane Wilmslow Cheshire



SK9 5AF

Tel: 0303 123 1113 (local rate) or 01625 545745 (national rate)

Email: casework@ico.org.uk