

## HGF Privacy Notice for Job Applicants

### Introduction

This notice applies to HGF Business Services Limited (UK), HGF Limited (UK), HGF Law LLP (UK), HGF BV (Netherlands), HGF GmbH (Switzerland), HGF Europe LLP (Germany, Austria and UK), HGF IP Limited (Ireland) and HGF SAS (France) together referred to as **HGF** within this Notice.

As part of any recruitment process, HGF collects and processes personal data relating to job applicants. HGF is committed to being transparent about how it collects and uses that data and to meeting its data protection obligations.

Key terms used in this policy include **Data Controller** and **Data Protection Officer**. These are:

**Data Controller:** If we hold personal data about you in relation to recruitment, HGF Limited of 1 City Square, 4<sup>th</sup> Floor, Leeds, LS1 2ES is the controller and responsible for your personal data. Our business is made up of different legal entities, as set out above. This privacy notice is issued on behalf of the HGF Group so when we mention HGF we are referring to each company in the group responsible for processing your data.

**Data Protection Officer:** All issues involving data protection should be referred to HGF's DPO via [dataprotection@hgf.com](mailto:dataprotection@hgf.com).

This privacy notice describes how we collect and use personal information about you during the HGF recruitment process, in accordance with the UK and General Data Protection Regulation (UK GDPR/GDPR). It applies to all HGF recruitment and engagement situations, whether those situations involve roles for employees, workers or contractors.

During the recruitment process we use recruitment software via a recruitment website (referred to in this notice as **Recruitment +**) which is supplied by our third party service provider, IRIS Software Group Limited (**IRIS**). For the purposes of the UK General Data Protection Regulation (**UK GDPR**) and Data Protection Act 2018 (**Data Protection Act**) (together, the **data protection laws**) IRIS are our Data Processor (as defined under the data protection laws). IRIS will only process your data in accordance with our instructions. Should you have any questions in relation to IRIS' recruitment software specifically, IRIS can be contacted at: 4th Floor Heathrow Approach, 470 London Road, Slough, England, SL3 8QY, otherwise please direct any questions to HGF.

It is important that you read this notice, together with any other privacy notices we may provide for different situations from time to time. For example, if you are successful in your recruitment process, you will receive another privacy notice on commencing your contract with HGF.

### What information does HGF collect?

HGF collects and processes a range of information about you as part of the recruitment process. This may include:

- your name, address and contact details, including personal email address and personal telephone number;
- CV and/or details of your qualifications, skills, experience and employment history;
- equal opportunities monitoring information (defined as special categories data) - this information is purely for statistical analysis and monitoring purposes
- answers to application questions including information you wish to provide in support of your application
- information about your current level of remuneration, including bonuses and benefit entitlements;
- information about your nationality and entitlement to work in the UK, Netherlands, Germany, France, Switzerland and Ireland and any other country in which you may be resident and we may have an office to which you are connected;
- CCTV images, in order to monitor the security and safety of our premises for our employees and visitors;
- results of any verbal, numerical or psychometric testing where it is completed as part of the application process; a copy of our providers data policy is available on request;
- reference information and information received from background checks (where applicable) including information provided by third parties, this information may be collected in conjunction with a third party provider, a copy of their data policy is available upon request;

- personal bank details for the purposes of reimbursing interview costs where appropriate.

The majority of the personal data to be provided by you is mandatory in connection with our recruiting activities. Failure to provide mandatory personal data may affect our ability to accomplish the purposes stated in this policy, including considering your suitability for employment and/or entering into an employment contract with you.

## How the information is collected

HGF may collect 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 driving licence; from forms completed by you at the start of the recruitment process (such as an application form); from correspondence with you; or through interviews, meetings or other assessments.

HGF may also collect personal data about you from third parties, such as recruitment agencies, external application websites, former employers (to verify your previous employment history), background vetting specialists (to verify your education history and carry out necessary credit checks), official bodies (such as criminal record bureaus), medical professionals and/or social media sites such as LinkedIn. HGF will seek information from third parties throughout the recruitment process, certain information (including employer references and background vetting) will only be collected once a conditional job offer to you has been made and accepted and when you have provided us with the contact information of who we should contact.

Data is stored in a range of different places, including on your application record, in HGF's HR management systems and in other secure IT systems.

## Why HGF processes personal data

HGF needs to process this data to take steps at your request prior to entering into an employment contract with you.

In some cases, we need to process data to ensure that we are complying with our legal obligations. For example, we are required to check an employee's entitlement to work in the country where you are based.

HGF also 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 HGF to manage the recruitment process, assess and confirm a candidate's suitability for employment and decide to whom to offer a job. HGF may also need to process data from job applicants to respond to and defend against legal claims.

We may undertake additional processing of personal data in line with the purposes set out above.

HGF may need to process special categories of data, such as information about ethnic origin, sexual orientation or religion or belief, to monitor recruitment and diversity statistics. It may also collect information about whether or not applicants are disabled to make reasonable adjustments for candidates who have a disability. HGF processes such information to carry out its obligations and exercise specific rights in relation to employment. Special categories of data require higher levels of protection. We have in place an appropriate policy document and safeguards which we are required by law to maintain when processing such data.

During the recruitment process, the **Recruitment +** software provided by our third party provider, IRIS, uses automated screening tools as part of the application process. The answers you provide to one or more of the questions in IRIS **Recruitment +** (excluding any special categories/equal opportunity questions) may result in your application being automatically declined. IRIS **Recruitment +** technology is used to help us manage the high volume of applications we receive and we can assure applicants the same outcome would occur if we manually reviewed your application. The reason for the decline will be made available to you in your candidate account.

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



## Who has access to data

Your information will be shared internally for the purposes of the recruitment exercise, including with members of the People and Talent Attraction team, outsourced HR or employment support in countries where this is applicable, interviewers involved in the interview process, managers in the business area with a vacancy and IT staff if access to the data is necessary for performance of their roles. This list is not necessarily exhaustive and other internal sharing of your personal data may be deemed necessary and appropriate as circumstances demand.

Your information will also be shared with providers of any verbal, numerical or psychometric testing where it is completed as part of the application process, this will include details of your name, email address and general

HGF will not share your data with other third parties, unless your application for employment is successful and you are made an offer of employment. HGF will then share your data with your former employers in order to obtain pre-employment references and background vetting specialists.

## How HGF protects data

We take the security of your data seriously. We have 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 our employees in the proper performance of their duties.

All our third-party service providers 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.

## For how long does HGF keep this data?

If your application for employment is unsuccessful, HGF will hold your data on file for a period of up to 18 months after the end of the relevant recruitment process subject to any exceptional circumstances and/or to comply with particular laws or regulations. If you agree with clear consent to allow HGF to keep your personal data on file, we will hold your data on file for a further one year for consideration for future employment opportunities. At the end of that period or once you withdraw your consent, your data is deleted or destroyed.

If your application for employment is successful, personal data gathered during the recruitment process will be transferred to your personnel file and retained during your employment. The periods for which your data will be held will be provided to you in a new privacy notice (covered under HGF's Data Privacy Policy (Internal)).

## Your rights

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

- Access and obtain a copy of your data on request;
- Request correction of the personal information that we hold about you;
- Request erasure of your personal information. This enables you to ask us to delete or stop processing your data, for example where data is no longer necessary for the purposes of processing; and
- Object to processing of your personal information where HGF is relying on its legitimate interests as the legal ground for processing.

In respect of your use of the IRIS software, IRIS will provide you with reasonable access to review the personal information retained in IRIS **Recruitment +** when you apply via **Recruitment +** and correct any inaccuracies it may contain. If you choose to register via **Recruitment +**, you may access your profile, correct and update your details, or withdraw your details at any time. To do this, you can access your personal profile by using the IRIS **Recruitment +** secure login. In all cases IRIS will treat requests to access information or change information in IRIS **Recruitment +** in accordance with applicable legal requirements.



Within your IRIS **Recruitment +** candidate account, you can also use the IRIS **Recruitment +** Download Data feature to generate an XML file of your current data that you have provided and/or have access to within the IRIS **Recruitment +** account.

Where you exercise your right to object or withdraw your consent to use of the IRIS **Recruitment +** software we and IRIS may process your personal data without your knowledge or consent where permitted or required by law or regulatory requirements to do so. In such a case, neither IRIS nor HGF will process more personal data than is required under the circumstances.

You have the right to raise concerns about how your personal data is being processed with the Information Commissioner's Office (ICO), the UK regulator for data protection issues ([www.ico.org.uk](http://www.ico.org.uk)) by going to the ICO's website: <https://ico.org.uk/concerns/> or contacting the ICO on 0303 123 1113 or [casework@ico.org](mailto:casework@ico.org). However, before doing so please make sure you have first made your complaint to us or asked us for clarification if there is something you do not understand. The ICO will expect you to have done this before reviewing your complaint.

If you wish to contact our People Team you may do so at [hr@hgf.com](mailto:hr@hgf.com) or by post to HGF Limited, 4th Floor, 1 City Square, Leeds, LS1 2ES.

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

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

#### Changes to this Privacy Notice

This notice is non-contractual. HGF reserves the right to update this policy notice at any time. HGF may also notify you in other ways from time to time about the processing of personal information in the recruitment process.

