



## CANDIDATE PRIVACY NOTICE

- At ZEDRA, we take the protection of your personal data privacy very seriously and maintaining the integrity and confidentiality of your personal data is very important to us. This Candidate Privacy Notice sets out how those members of the Zedra Group of companies (the “**Zedra Group**”) who are subject to the General Data Protection Regulation of the European Union (the “**GDPR**”) and/or local legislation on data protection (altogether, (the “**Law**”) collect, use and disclose your personal data, and your rights as a data subject in relation to your personal data which is processed by a member of Zedra Group (a “**ZEDRA Company**”), when you are apply to work for ZEDRA. The main purpose of the Law is to ensure transparent processing of personal data and to protect your rights and freedoms as a data subject.
- This Candidate Privacy Notice confirms how the Zedra Group looks after your personal data and your rights as a data subject. We promise to protect the privacy of your personal data, not to sell your personal data and to implement procedures to enable you to exercise your rights as a data subject under the Law. The Zedra Group protects your personal data with up to date storage and security techniques.
- In this Privacy Notice, “us”, “we” and “our” refers to the Zedra Group. “Processing” means any operation performed on your personal data
- The ZEDRA Company is the controller of your personal data and determines the purposes and means by which your personal data is processed and is ultimately responsible for the processing of that personal data. The controller may appoint a third party to process your personal data, including another ZEDRA Company, which will process that personal data on the instructions of the controller, and will be placed under a duty of confidentiality and obliged to implement appropriate technical and organisational measures to ensure the security of data. In certain circumstances, there may be joint controllers who will agree their respective responsibilities for compliance with the Law including which controller has agreed to respond to a data subject who wishes to exercise any rights under the Law, although you may exercise your rights against either controller.
- If you wish to receive details regarding the controller and any third party that has been engaged to assist the controller in delivering services to you and with whom the controller may have shared your personal data, or of any joint controllers, and the arrangements made between the joint controllers to comply with the Law, please contact the Data Protection Officer on **Data Protection@ZEDRA.com** or by phone **+44 1534 844245**. More information on the Zedra Group may be found at [www.zedra.com](http://www.zedra.com).
- We may amend this Candidate Privacy Notice from time to time to reflect any changes in the way that we process your personal data and the current Candidate Privacy Notice will always be available on our website.

## Lawfulness of Processing

- The Law provides that we may only process your personal data in certain circumstances. These are:-
  - When we have a legitimate interest for processing.
  - That you have given your consent.
  - To fulfil a contract to which you are party.
  - To comply with a legal obligation to which we are subject.
- As part of any recruitment process, ZEDRA collects and processes personal data relating to job applicants. We are committed to being transparent about how we collect and use that data and to meet our data protection obligations.

- ZEDRA must collect and process personal data in order to take steps at your request prior to entering into a contract with you. It may also need to process your data to enter into a contract with you.
- In some cases, ZEDRA needs to process data to ensure that we comply with legal obligations. For example, we are required to check a successful applicant's eligibility to work before employment starts.
- ZEDRA have a legitimate interest in processing personal data during the recruitment process and for keeping records of the process. Processing data from job applicants allows us to manage the recruitment process, assess and confirm a candidate's suitability for employment and decide to whom to offer a job. We may also need to process data from job applicants to respond to and defend against legal claims.
- ZEDRA may process information about whether or not applicants are disabled to make reasonable adjustments for candidates who have a disability. This is to carry out our obligations and exercise specific rights in relation to employment.
- Where we process other special categories of data, such as information about ethnic origin, sexual orientation, health or religion or belief, this is for equal opportunities and monitoring purposes.
- For some roles, we are obliged to seek information about criminal convictions and offences. Where we seek this information, we do so because it is necessary for us to carry out our obligations and exercise specific rights in relation to employment.
- We will not use your data for any purpose other than the recruitment exercise for which you have applied.
- If your application is unsuccessful, we may keep your personal data on file for up to 12 months in case there are future employment opportunities for which you may be suited. We will ask for your consent before ZEDRA keeps your data for this purpose and you are free to withdraw your consent at any time.
- When processing on the basis that it is in our legitimate interests to do so, we may collect and share your personal data subject to an offer being made, from and with the following:
  - Third parties in order to obtain pre-employment references from other employers, to carry out employment background checks and criminal records checks.
  - Members of the HR and recruitment team, the recruiting manager, managers in the business area in which you are applying to work and IT staff, if access to the data is necessary for performance of your role.
  - Third parties who require the personal data in order to provide a service to us in connection with your contract of employment, such as payroll, the provision of benefits and the provision of occupational health services, and includes other ZEDRA Companies, consultants, agents, contractors, delegates, internet and other service providers, data storage providers, and the directors and/or employees of such third parties.
  - Our advisers who provide us with advice or assistance.
  - Government bodies, tax authorities other authorities in any jurisdiction.
  - Any third party as a result of any assignment, transfer or novation of our rights and obligations to you, or any merger, restructure, sale or acquisition of the Zedra Group or any part thereof or to anyone to whom we may transfer our rights and/or obligations.
  - Other ZEDRA Companies in connection with the proper management of the Zedra Group.
- You may object at any time to our processing of any or all of your personal data on this ground by contacting the Data Protection Officer and the processing of personal data may be restricted while those legitimate interests are considered, and, if it is decided that we do not have legitimate grounds for processing that personal data, can be erased.
- Under the Law, certain kinds of personal data such as data relating to health, racial or ethnic origin, political opinions, religious and philosophical beliefs, trade union membership, genetic or biometric data, sex life or sexual orientation is considered to be a special category of personal data ("Special Data") and can only be processed in certain circumstances, such as with your explicit consent or if it has been made public by you.
- We will only process any Special Data with your explicit consent, unless processing is necessary to carry out our obligations and exercise our specific rights in the field of employment, social security and social protection law or if Special Data has been made public by you.

## How we collect your data

- We collect your personal data in a variety of ways such as:-
  - From third parties, such as references supplied by former employer, information from employment background check providers, information from credit reference agencies and information from criminal records checks as permitted by law.
  - From the information and documentation that you provide at any time and from time to time including information and documentation provided at meetings.
  - From application forms, CVs, passport or other identity documents such as your driving licence, from forms completed by you at the start of or during employment (such as benefit nomination forms); from correspondence and communication with you, or through interviews, meetings or other assessments.
  - From other ZEDRA Companies.
  - From your agents or advisers.
  - From publicly available sources or from third parties where we need to conduct background checks about you.

## The categories of the data we collect

- We may collect the following categories of personal data about you:
  - Your name, address and contact details, including email address and telephone number, date of birth, passport or national identity card details.
  - Country of birth, domicile and citizenship, gender and marital status, .
  - Contact information such as residential address, email address and telephone number.
  - Information relating to your tax affairs including tax identification number.
  - The terms and conditions of your employment.
  - Details of your qualifications, skills, experience and employment history, including start and end dates, with previous employers and with the organisation.
  - Information about your remuneration, including entitlement to benefits such as pensions or insurance cover and tax obligations.
  - Information about your nationality and entitlement to work.
  - Whether or not you have a disability for which ZEDRA needs to make reasonable adjustments during the recruitment process;
  - Details of any disciplinary or grievance procedures in which you have been involved, including any warnings issued to you and related correspondence.
  - Equal opportunities monitoring information, including information about your ethnic origin, sexual orientation, health, religion and belief.
- We may collect this information in a variety of ways e.g. data might be contained in application forms, CVs or resumes, obtained from your passport or other identity documents, or collected through interviews or other forms of assessment, including online tests.
- We may also collect personal data about you from third parties, such as references supplied by former employers, information from employment background check providers and information from criminal records checks. ZEDRA will seek information from third parties only once a job offer to you has been made and will inform you that it is doing so.
- Data will be stored in a range of different places, including on your application record, in HR management systems and on other IT systems (including email).

## Automated decision-making

- ZEDRA's recruitment processes are not based solely on automated decision-making.

## Who has access to data?

- Your information may be shared internally for the purposes of the recruitment exercise. This includes members of the HR and recruitment team, interviewers involved in the recruitment process, managers in the business area with a vacancy and IT staff if access to the data is necessary for the performance of your role.
- ZEDRA will not share your data with third parties, unless your application for employment is successful and an offer of employment is made. ZEDRA will then share your data with former employers to obtain

references for you, employment background check providers to obtain necessary background checks and the Disclosure and Barring Service to obtain necessary criminal records checks.

- In sharing your personal data for the reasons set out elsewhere in this Candidate Privacy Notice, we may need to transfer it to other entities, including other ZEDRA Companies, located in the European Union, all of which will apply the GDPR, as well as to entities in jurisdictions which are considered to provide an adequate level of protection for your personal data as is provided under the GDPR.
- If we transfer your personal data to entities in countries outside the European Union which do not provide an adequate level of protection for your personal data, including ZEDRA Companies, we will ensure that your personal data will always be protected by appropriate safeguards to give you enforceable rights and legal remedies. You may ask us at any time what safeguards have been put in place to protect your personal data.

## Retention of your data

- If your application for employment is unsuccessful, ZEDRA may hold your data on file for up to 12 months after the end of the relevant recruitment process. If you agree to allow the ZEDRA to keep your personal data on file, we will hold your data on file 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 the Employee Privacy Notice.

## Is it necessary for me to provide personal data to receive the services?

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

## Your rights as a data subject

- You have the following specific rights (the “Rights”) under the Law:-
  - To request confirmation as to whether we are processing personal data about you and, if so, to make a subject access request (a “SAR”) for information about the processing of that personal data.
  - To request rectification of inaccurate or incomplete personal data concerning you.
  - To require us to erase or restrict the processing of your personal data in certain circumstances;
  - To request copies of any personal data which is being processed by automated means with your consent or under contract in a machine readable format.
  - To object to the processing of personal data which is being processed in the public interest or to pursue the legitimate interests of the controller.
  - To object to processing for direct marketing purposes.
- Please note that the Rights are not absolute and the controller may be legally entitled to refuse requests in certain circumstances.

## Data Protection Officer

- If you have any questions about the processing of your personal data, or you wish to make a SAR or exercise any of the other Rights, please contact the Data Protection Officer at:-

ZEDRA Data Protection Officer  
By post - 50 La Colomberie, St. Helier, Jersey, JE2 4QB  
By email – [Data Protection@ZEDRA.com](mailto:Data Protection@ZEDRA.com)  
By telephone – +44 1534 844245

- You may be asked to provide identification to ensure that another person is not attempting to fraudulently exercise your Rights and to confirm which of the Rights you wish to exercise to enable the controller to deal with your request without delay.

- If you are not satisfied with our processing of your personal data, or how we respond to, or deal with, the exercise of any of your Rights, you can make a complaint to the local regulator. The Data Protection Officer will provide you with contact details.

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