

## Candidate Privacy Policy

### PURPOSE

Kane respect your privacy and is committed to managing and safeguarding the information that applicants provide to us. The purpose of this statement is to inform candidates as to how data is collected, processed, protected and used.

### PROCEDURE SUMMARY

Kane is committed to upholding the principles of the GDPR when processing personal data. According to Article 5 of the GDPR, personal data shall be:

- i) Processed lawfully, fairly and transparently.
- ii) Collected for specified purposes, and not processed for other purposes.
- iii) 'Just the right amount' of data for the task at hand – not too much, but enough to do the task accurately.
- iv) Accurate and up to date.
- v) Kept no longer than necessary.
- vi) Processed securely.

### BACKGROUND / SCOPE

This policy applies to all candidates who apply for jobs within Kane.

### APPLICABILITY

This applies to any candidates or applicants that have registered an interest in working for the business that includes those who apply for an actual or potential vacancy and includes agency workers, sub-contractors or work experience/placement students.

This policy is non-contractual and can be amended at any time.

### PROCEDURE DETAILS

<b>A. Data collected about candidates</b>	<b>1.1</b>	<p>As part of the recruitment process, the business will collect, store and process the following data from its applicants:</p> <ul style="list-style-type: none"> <li>i) Data provided on a CV or Application form. This might include name, title, address, telephone number, personal email address, date of birth, gender, employment history or qualifications.</li> <li>ii) Any data collected during interview.</li> <li>iii) Any results of assessments or competence tests that may have been taken including aptitude or psychometric testing.</li> <li>iv) Information about health, including any medical conditions.</li> <li>v) Information about criminal convictions and offences.</li> <li>vi) Information about religion, race or ethnicity, or sexual orientation. This information is collected to comply with statutory</li> </ul>
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equal opportunities monitoring and reporting requirements.

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- B. How will candidate data be collected**
- 1.1** Personal information about candidates could be collected from a number of sources
- i)** From the candidate by CV or application form.
  - ii)** A recruitment agency or search consultancy whom the applicant has registered with or instructed to act on their behalf.
  - iii)** An online job board where the candidate has registered.
  - iv)** Their named referees.
  - v)** Through Occupational Health service after job offer.

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- C. How will candidate data be used**
- 1.1** Personal information collected about candidates will be used for the following purposes:
- i)** To assess the candidate's skills, qualifications and suitability for work.
  - ii)** To carry out background and reference checks, where applicable.
  - iii)** To communicate to candidates about the recruitment process.
  - iv)** To keep records of recruitment and hiring processes.
  - v)** To comply with legal and statutory requirements.
- 1.2** Information provided by candidates will be used to shortlist for the role to ensure that the applicants meet with the personnel specification of the job prior to invitation for interview.
- 1.3** Hiring managers will shortlist for interview and will be provided with CV or application form only. Information relating to equal opportunities or other sensitive information will not be provided.
- 1.4** Hiring managers or members of the HR team will not share your personal information with any organisation other than Kane except with your express consent.

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- D. Data Sharing**
- 1.1** Kane will only share personal information with the following third parties for the purposes of processing a candidate's application.
- i)** A recruitment agency or search consultancy with whom the candidate has registered or instructed to feedback on interviews or to process their application.
  - ii)** A third-party provider of skills, aptitude or psychometric testing used in the selection process.
  - iii)** Associated companies.
- 1.2** All third-party service providers and associated companies are required

		to take appropriate security measures to protect the candidate's personal information.
	<b>1.3</b>	Kane do not allow third parties to use personal data for their own purposes and are only permitted to process the personal data for specified reasons.
<b>E. Data Security</b>	<b>1.1</b>	Kane have appropriate security measures in place to prevent personal information from being lost, used or accessed in an unauthorised way, altered or disclosed.
	<b>1.2</b>	Access to personal information is limited to employees, agents, contractors or other third parties who have a business 'need to know' and will only process candidate information on the instruction of Kane Group and under a duty of confidentiality.
	<b>1.3</b>	Procedures are in place to deal with suspected security breaches and both candidates involved, or any applicable regulator will be notified if the business is legally required to do so.
<b>F. Data Retention</b>	<b>1.1</b>	For successful candidates, Kane will retain your information as part of your employee file for the duration of your employment plus 7 years at the end of your employment.
	<b>1.2</b>	For all other candidates, Kane will retain your personal information for as long as necessary to fulfil the purposes it was collected for, including for the purposes of satisfying any legal, accounting, or reporting requirements.
<b>G. Rights to access data</b>	<b>1.1</b>	Under certain circumstances, by law candidates have the right to: <ul style="list-style-type: none"> <li><b>i)</b> Request access to personal information (commonly known as a "data subject access request").</li> <li><b>ii)</b> Request correction of the personal information that Kane hold about the candidate.</li> <li><b>iii)</b> Request the erasure of personal information.</li> <li><b>iv)</b> Request the restriction of and objection to processing of personal information.</li> <li><b>v)</b> Request the transfer of personal information to a third party.</li> </ul>
	<b>1.2</b>	By applying for a job role, the candidate has provided their consent to the processing of their personal information for the purpose of the recruitment exercise. A candidate has the right to withdraw your consent at any time. To withdraw consent, please contact the Data Protection Officer.
	<b>1.3</b>	Some of these rights are not automatic, and Kane reserve the right to discuss with the candidate why the business might not comply with their request.
	<b>1.4</b>	If a candidate wants to exercise any of the above rights, please contact the Chief Privacy Officer in writing.
<b>H. Candidate's Right to raise a complaint</b>	<b>1.1</b>	A candidate retains the right at all times to lodge a complaint about the management of their personal data with the Information Commissioner's Office at <a href="https://ico.org.uk/concerns/">https://ico.org.uk/concerns/</a>
	<b>1.2</b>	For candidates that have any concerns or queries about use of their

personal data, they should contact the Data Protection Officer.

## DEFINITIONS

Term / Acronym	Definition
<b>Definition of Associated Companies</b>	Associated Companies refers to those companies belonging to the same family of companies as or who benefit from a close relationship, shared systems or shared ownership.

## ROLES AND RESPONSIBILITIES

Entity / Personnel	Responsibilities
<b>HR &amp; All Managers</b>	Ensure that policy and procedure is carried out in accordance to the requirements.
<b>Candidates</b>	Candidates must read and understand the policy if applying for a job role within Kane.