

Data Controller

The 'Group', "Company" "we", "us", "our" for the purposes of this notice means Lagan Specialist Contracting Group Limited and its associated companies, each of which is a data controller in its own right for the purposes of data protection law.

As part of our candidate application and recruitment activities we collect, process and store personal and special categories of data which may directly or indirectly identify you (together "personal information"). We process personal information for a range of purposes relating to general recruitment activities as well as the recruitment process and this may include your application, assessment, pre-employment screening, and your worker permissions.

This Candidate Privacy Notice ("Privacy Notice") sets out:

- why we collect your personal information;
- what information is collected and;
- how it is processed within the recruitment process.

Throughout this Privacy Notice we use the term "processing" to cover all activities involving your personal information, including collecting, handling, storing, sharing, accessing, using, transferring and disposing of the information.

Why do we collect your personal information?

We only process your personal information where we are lawfully permitted for one or more of the purposes set out below. Not all of the purposes set out below will apply to you all of the time.

a) Application: activities carried out in the course of receiving and assessing candidate applications, including reviewing general applications or applications for specific jobs and processing information to enable subscription to our job alerts. This may involve the processing of your CV, name, address, employment history, academic and professional qualifications, age, diversity data including gender, ethnicity, disability, sexual orientation, nationality and previous disciplinary matters;

b) Assessment: activities carried out in the course of assessing candidate suitability for roles at the Company, which may involve the processing of your CV, psychometric tests, interview (face to face, telephone or video), behavioural assessments (such as a role play, group exercise or presentation), technical assessments;

c) Pre-employment screening: pre-employment screening activities carried out for the purposes of insurance risk assessments; child protection clearances, proof of right to work, and criminal records checks;

d) Candidate searches: In the course of our search activities, we use personal information that we have collected concerning candidates to identify professional opportunities that we think may be of interest. We may contact potential candidates from time to time regarding such opportunities. We may also contact individuals from time to time to solicit names of, or other personal information regarding, potential

candidates in connection with a search that we are conducting and for purposes of market intelligence;

e) General recruitment activities: market research activities and specific or speculative recruitment-related activities.

What personal information might we process and how we collect it?

Generally, we collect personal information directly from you in circumstances where you provide personal information to us by applying directly for a role at the Company, or information that we learn about you through your interactions with us, or with third parties (e.g. recruitment agencies). We may also collect personal information about you from third parties, including, for example, when a referee provides information about you, when a colleague recommends that we consider you for a position or from other sources where you have made your personal information publically available for the purposes of recruitment on jobs boards, LinkedIn (or other publically available social media networks and databases). Here are some examples of the type of information we may process about you. There's a full list in the schedule at the end of this notice.

Your Personal Information

- Personal details such as name, address, email address and date and place of birth;
- Individual demographic information in compliance with legal requirements (such as marital status, national identifier, passport/visa information, nationality, citizenship, disability, work permit, date and place of birth or gender)
- Work history/job data; previous employers, positions, dates, etc.;
- Compensation; basic salary, benefits, bonuses, etc.;
- Education and work history including professional qualifications and skills;
- Health issues requiring adaptations to working environment;
- Employer feedback / references;
- Employment contract related information (including compensation, location, hours of work and so on)
- Nationality / visa / right to work permit information; (e.g. passport, driving licence, National Insurance numbers (or regional equivalent));
- Photographs and images from recorded assessments or from on site CCTV;

Ref No:	7-CORE-BMS-GN028	Issue No:	1	Issue Date:	25.05.18
---------	------------------	-----------	---	-------------	----------

- Results of pre-employment screening checks (e.g. criminal records checks where permitted under local law);
- Leaves of absence (such as maternity leave, sickness absence)
- Disciplinary / grievance records
- Time and attendance details
- Bank account details for salary payment purposes
- Expenses such as travel and expenses claimed from the Company
- Personal information contained in CVs (e.g. name, address, telephone number, e-mail address, employment history, degree(s) and other qualifications, languages and other skills). These may also include, without limitation: age, nationality and race (only to the extent allowed by law), compensation details, a record of our contact history with you and comments from third parties
- Skills and qualifications
- Personal information which you have made available for the purposes of recruitment on jobs boards, LinkedIn (or other publically available social media networks) and to third parties such as recruitment agencies that we work closely with
- Training history and plans
- Health & safety incidents, accidents at work and associated records
- Audio recordings of telephone interviews
- Video recordings of interviews
- Notes from face to face interviews
- Psychometric test results and associated reports
- Results from behavioural assessments (e.g. Assessment Centre exercises)
- Results from technical assessments
- References and recommendations

Your Special Categories of Information

During the process we may also inadvertently capture some special categories of personal information about you (e.g. information relating to your racial or ethnic origin, religious or philosophical beliefs, trade union membership, physical or mental health or condition, sexual orientation), where this has been provided or made publically available by you or can be inferred from your CV.

We may also process certain special categories of information about you (e.g. information about a physical or mental health or condition) in order to make reasonable adjustments to enable our candidates to apply for jobs with us, to be able to take online/telephone assessments, to attend interviews/assessment centres, to prepare for starting at the Company (if successful) and to ensure that we comply with any legal obligations placed on us with regard to our hiring.

We may also process information relating to criminal convictions and offences (e.g. as part of pre-employment screening checks). We will only process special categories of information or information about criminal convictions and offences where we have obtained your explicit consent or where permitted by applicable laws (and then only when necessary for the purposes mentioned above).

Where we are processing personal information based on your consent, you have the right to withdraw that consent at any time where there is no other legal basis for the processing.

Legal basis for the processing

The Company's entitlement to process your personal information is governed by a number of processing conditions. This means that we may rely on more than one of these conditions in order to process elements of your personal information throughout the recruitment process.

- It is in the legitimate interests of the Company to process your personal information in the administration of your application and for general recruitment purposes;
- The Company will also process your personal information where it is required by law or regulation. This processing will always be fair and lawful and will at all times comply with the principles of applicable privacy laws in the country where you have applied to be employed;
- During the course of your application it may also be necessary for the Company or its suppliers to process special categories of information about you where we have obtained your explicit consent or where permitted by applicable laws.

Ref No:	7-CORE-BMS-GN028	Issue No:	1	Issue Date:	25.05.18
---------	------------------	-----------	---	-------------	----------

Guidance Note

'Candidate Privacy Notice'

Who we share your personal information with

The Company will need to share your personal information internally (both in the country where you may work and in other countries in which we have central operations) and may require to share it with some external parties or associates of the Company. Some of these third parties and associates will be located outside the European Economic Area ("EEA"). Where we transfer your personal information outside the EEA, we will ensure that any transfer of your personal information is compliant with applicable data protection law. Your information will only be shared if it is necessary or required (for example in order to carry out pre-employment screening).

The recruitment process will involve:

- Assessing and progressing your application;
- Assessing your suitability (skills, strengths, behaviours for the role); and
- Activities needed to complete the on-boarding and screening process should your application be successful.

To enable these processes your personal information may be shared internally, but the information shared is limited to what is required by each individual to perform their role in the recruitment process.

Your personal information may be shared internally within the Company (including with other Group companies) with the following people:

- Those employees who would have managerial responsibility for you or are acting on their behalf;
- Employees in HR;
- Employees with responsibility for investigating issues of non-compliance with laws and regulations, internal policies and contractual requirements;
- Employees in IT and system owners who manage user access;
- Other employees in relation to specific audits/investigations; and
- Security managers for facilities / premises.

The Company may also need to share your information with certain external third parties including:

- Companies who provide recruitment and candidate interview and assessment services to the Company;
- Suppliers who undertake background screening on behalf of the Company (criminal checking bureaus, etc.);
- Academic institutions (Universities, colleges, etc.) in validating information you've provided;

- Individuals and companies that you have previously worked for who may provide references/recommendations to the Company;
- Other third-party suppliers (or potential suppliers), who provide services on our behalf.

How we protect your information

Our HR and Recruitment systems are protected to ensure that unauthorised or unlawful processing of personal information, accidental loss or destruction of, or damage to, personal information does not occur.

Your Rights

a) Access, correction and deletion

You are entitled to see the personal information the Company holds about you. You can also request changes to be made to incorrect personal information and can ask for your personal information to be deleted or blocked if you legitimately think that the Company shouldn't be processing that information or is processing it incorrectly, except where retention of that personal information is required in the context of a legal dispute, or as otherwise required by law. If access, correction or deletion is denied, the reason for doing so will be communicated to you.

b) Inquiries, objections and complaints

If you have any queries about this notice or your personal information generally, including questions about accessing your personal information or correcting it, you should contact the HR team at recruitment@laganscg.com in the first instance. You may also withdraw consent to the processing of your personal information or submit complaints and/or objections to the processing of your personal information by sending a request in writing to: Human Resources Team at recruitment@laganscg.com.

It is your responsibility to keep your personal information up to date so that accurate application records can be maintained.

When asked to remove a record from our database, Human Resources will retain minimal personal information in order to prevent future contact and where required in accordance with legal requirements.

c) Automated processing

We do not generally make recruiting or hiring decisions based solely on automated decision-making.

d) Direct Marketing

The Company will not use personal information collected about you for the purposes of recruitment to offer you any products or services for personal or family consumption ("direct marketing") or provide your personal information to third parties for their direct marketing. We will ask for your

Ref No:	7-CORE-BMS-GN028	Issue No:	1	Issue Date:	25.05.18
---------	------------------	-----------	---	-------------	----------

Guidance Note

'Candidate Privacy Notice'

consent prior to sending you communications about future events and opportunities that are relevant to you.

e) Changes to this Privacy Notice

As this Privacy Notice is updated, the current version will be available via this link.

Criminal records checks

Given the nature of our business, we have legal and, at times, contractual obligations to ensure that the people we employ meet the standards required by our clients. We therefore may ask questions about any prior civil or criminal proceedings you may have been subject to and may also conduct criminal record checks.

Ref No:	7-CORE-BMS-GN028	Issue No:	1	Issue Date:	25.05.18
---------	------------------	-----------	---	-------------	----------