

# Privacy Notice for Job Applicants

## Introduction

Solventis Ltd is a company registered in England and Wales with registered company number 03366192. Our registered office address is Compton House, The Guildway, Old Portsmouth Road, Guildford, Surrey, GU3 1LR.

Solventis is a distributor and manufacturer of petrochemicals, automotive fluids and aviation de-icing fluids. Our customers and suppliers include businesses of all sizes across the world.

In accordance with the General Data Protection Regulation (GDPR), we have implemented this Privacy Notice to inform you, as prospective employees of our Company, of the types of data we process about you. We also include within this notice the reasons for processing your data, the lawful basis that permits us to process it, how long we keep your data for, your rights regarding your data and how you can contact us.

The information to which our Privacy Notice applies is "personal data" (which is defined in current data privacy law as information which can identify living people). Where we refer to personal data below, we use the term "personal information".

This Privacy Notice is effective as of 25<sup>th</sup> May 2018 and will be updated from time to time to reflect any changes in the way we handle your personal information or any changes in applicable laws.

## Data protection principles

Under GDPR, all personal information obtained and held by us must be processed according to a set of core principles. In accordance with these principles, we will ensure that:

- processing is fair, lawful and transparent
- data is collected for specific, explicit, and legitimate purposes
- data collected is adequate, relevant and limited to what is necessary for the purposes of processing
- data is kept accurate and up to date. Data which is found to be inaccurate will be rectified or erased without delay
- data is not kept for longer than is necessary for its given purpose
- data is processed in a manner that ensures appropriate security of personal information including protection against unauthorised or unlawful processing, accidental loss, destruction or damage by using appropriate technical or organisation measures
- we comply with the relevant GDPR procedures for international transferring of personal information.

## Types of data held

We keep several categories of personal information on our prospective employees in order to carry out effective and efficient processes. We keep this data stored in a range of different places, including application forms, HR and other IT systems, including email.

Specifically, we may hold the following types of data:

- personal details such as name, address, phone numbers
- name and contact details of your next of kin
- your photograph
- your gender, marital status, information of any disability you have or other medical information
- right to work documentation
- information on your race and religion for equality monitoring purposes
- information gathered via the recruitment process, eg CV and covering letter
- references from former employers
- details on your education and employment history etc
- qualification certificates
- professional memberships
- driving licence
- criminal convictions.

## Data we collect

You provide several pieces of data to us directly during the recruitment exercise. In some cases, we will collect data about you from third parties, such as employment agencies or former employers when gathering references.

Should you be successful in your job application, we will gather further information from you, for example, your bank details and next of kin details, once your employment begins.

## Lawful basis for processing

The law on data protection allows us to process your data for certain reasons only. The information below categorises the types of data processing we undertake and the lawful basis we rely on.

<b>Activity requiring your data</b>	<b>Lawful basis</b>
Carrying out checks in relation to your right to work in the UK	Legal obligation
Making reasonable adjustments for disabled employees	Legal obligation
Making recruitment decisions in relation to both initial and subsequent employment e.g. promotion	Our legitimate interests
Making decisions about salary and other benefits	Our legitimate interests
Making decisions about contractual benefits to provide to you	Our legitimate interests
Assessing training needs	Our legitimate interests
Dealing with legal claims made against us	Our legitimate interests
Preventing fraud	Our legitimate interests

## Special categories of data

Special categories of data are data relating to your:

- health
- sex life
- sexual orientation
- race
- ethnic origin
- political opinion
- religion
- trade union membership
- genetic and biometric data.

We carry out processing activities using special category of personal information:

- to determine reasonable adjustments.

Most commonly, we will process special categories of data when the following applies:

- you have given explicit consent to the processing
- we must process the data in order to carry out our legal obligations
- we must process data for reasons of substantial public interest
- you have already made the data public.

## If you do not provide your data to us

One of the reasons for processing your data is to allow us to carry out an effective recruitment process. Whilst you are under no obligation to provide us with data, we may not be able to process, or continue with your application if you do not.

## Criminal conviction data

We will only collect criminal conviction data where it is appropriate given the nature of your role and where the law permits us. This data will usually be collected at the recruitment stage, however, may also be collected during your employment. We use criminal conviction data to determine your suitability, or your continued suitability for the role. We rely on the lawful basis of legitimate interests to process this data.

## Who we share your data with

Your data will be shared with colleagues with the company where it is necessary for them to undertake their duties with regard to recruitment, for example the HR Manager and recruiting managers in the area of work where the vacancy is. In some cases, we will collect data about you from third parties, such as employment agencies.

Your data will be shared with third parties if you are successful in your job application and made an offer of employment. In these circumstances, the third parties we will share your data is with former employers to obtain references, employment background providers to obtain necessary background checks (where applicable) and for the administration of payroll, benefits and pension.

We may also share your data with third parties as part of a Company sale or restructure, or for other reasons to comply with a legal obligation upon us. We have a data processing agreement in place with such third parties to ensure data is not compromised. Third parties must implement appropriate technical and organisational measures to ensure the security of your data.

We do not share your data with bodies outside of the European Economic Area.

## Protecting your data

We are aware of the requirement to ensure your data is protected against accidental loss or disclosure, destruction and abuse. We have implemented processes to guard against such.

## Data retention periods

We only keep your data for as long as we need it for, which, in relation to unsuccessful candidates, is six months to a year.

If your application is not successful and we have not sought consent or you have not provided consent upon our request to keep your data for the purpose of future suitable job vacancies, we will keep your data for six months once the recruitment exercise ends. If we have sought your consent to keep your data on file for future job vacancies, and you have provided consent, we will keep your data for nine months once the recruitment exercise ends. At the end of this period, we will delete or destroy your data, unless you have already withdrawn your consent to our processing of your data in which case it will be deleted or destroyed upon your withdrawal of consent.

Where you have provided consent to our use of your data, you also have the right to withdraw that consent at any time. This means that we will stop processing your data and there will be no consequences of withdrawing consent.

If your application is successful, your data will be kept and transferred to the systems we administer for employees. We have a separate Privacy Notice for employees, which will be provided to you.

## Automated decision-making

Automated decision-making means making decision about you using no human involvement e.g. using computerised filtering equipment. No decision will be made about you solely on the basis of automated decision-making.

## Your rights

Under certain circumstances, you have rights under data protection laws in relation to your personal information. You have the right to:

- request access to your personal information
- request correction of your personal information
- request erasure of your personal information
- object to processing of your personal information
- request restriction of processing your personal information

- request transfer of your personal information
- not to be subject to a decision based solely on automated decision-making.

In addition to the above rights, you also have the unrestricted right to withdraw consent, that you have previously provided, to our processing of your data at any time. Withdrawing your consent means that we will stop processing the data that you had previously given us consent to use. There will be no consequences for withdrawing your consent. However, in some cases, we may continue to use the data where so permitted by having a legitimate reason for doing so.

If you wish to exercise any of the rights explained above, please see contact details below. You will not have to pay a fee to access your personal information. However, we reserve the right to charge a reasonable fee if your request is manifestly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

### Making a complaint

Although, we always invite you to address your concerns with us directly, you also have the right to lodge a complaint with the Information Commissioner's Office ("ICO") about our processing of your personal information if you consider the processing of the data concerning you infringes data protection regulations. The ICO's contact details are:  
Address: ICO Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF  
Telephone number: 0303 123 1113

### Changes to our Privacy Notice

We reserve the right to modify this Privacy Notice at any time, so please review it frequently. Changes and clarifications will take effect immediately upon their posting on the website. If we make material changes to this Privacy Notice, we will notify you on the website.

### Contact details

If you have any questions about how Solventis protects your personal information, if you wish to make a complaint about our use of your personal information or if you wish to exercise any of your rights in relation to your data subject rights, please contact our Data Privacy Manager at [dataprotection@solventis.net](mailto:dataprotection@solventis.net).

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