

## Candidate privacy notice – KINDRED GROUP (the "Company")

### What is a privacy notice?

We want to ensure you understand what information we collect about you, how we will use it and for what purpose.

We are also required by data protection legislation to explain certain matters to you.

### What personal data do we collect about you?

As part of the application process, we will collect, store and process personal information about you including your:

- title, name, date of birth, address, contact details, and immigration status/right to work confirmation;
- your personal or work related (depending on which you choose to submit) e-mail address and your password (which enable us to create a user account);
- academic record and qualifications;
- recruitment and employment history including information about your previous remuneration;
- any other information you have provided to us voluntarily including in your application form, curriculum vitae or during interview.

Initially, we use a third party, namely eArcu (company registration number 06957383, VAT registration number GB975364481, whose registered office is at Mardell House, 9-11 Vaughan Road, Harpenden Herts AL5 4HU) to obtain this information from you.

However it may be that there will be other sources of this information including third parties such as employment agencies, your former employer(s) and referees, and background check agencies.

### How and why will we use your personal data?

As you will appreciate, we need to use your personal information to process your application and determine your suitability for the role. We also need to ensure that we comply with our legal obligations regarding checking your right to work in a specific country.

In most cases, we will use your personal information to comply with our legal obligations, to take steps towards entering into a contract with you, or to further the Company's legitimate business interests.

The situations in which we will commonly use your personal information include:

- assessing your skills, qualifications and suitability for the role;
- carrying out our vetting processes;
- communicating with you about the recruitment process;
- making informed and fair recruitment decisions;
- maintaining appropriate records of our recruitment process.

We are guided by the principle that you should not be surprised by any use we make of your personal information.

#### What happens if you do not provide personal information?

You are required by law to provide certain personal information to us, for example to enable us to verify your right to work in a specific country in the event that we offer you a job. If you fail to provide certain personal information when requested, we may not be able to continue with your application.

#### Who else might your personal data be shared with?

Where there is a decision to offer you a contract of employment, we may share your information with appropriate third parties. This may include:

- our occupational health providers in relation to any pre-employment medical questionnaire/examination;
- if psychometric testing is carried out a candidate selection organisation;
- previous employers, or named individuals as part of a reference request process;
- credit reference agencies or any other vetting organisation;
- our group companies for the purposes of future employment;
- Our recruitment agent

The Company is part of a global organisation and to ensure the provision of effective and efficient services and communication throughout the group, we may be required to transfer your personal information internationally, such as to our group companies in other EEA countries.

Your personal data may therefore be stored and processed outside of the European Economic Area (EEA), in countries that may have different data protection rules to our own. However, the Company will only transfer your personal information outside of the

EEA where appropriate safeguards have been put in place, normally the use of contractual clauses that have been approved by the European Commission. If you would like to know more about this, see the contact details at the bottom of this notice.

#### How long do we keep your personal data?

If your application is unsuccessful:

- your personal information may be retained for up to six months after we have notified you of our decision, in case there is any dispute in connection with your application; and
- we will ask you if you would like us to retain your personal information for longer in case any suitable alternative vacancies arise in the future. If you agree to us doing so, you are free to withdraw that consent at any time.

If your application is successful, you will be sent a new privacy notice explaining processing of data as an employee.

#### How do we keep your personal data secure?

Our partner, eArcu, has a full Information Security Management System which is ISO 27001 certified.

We also take steps to ensure all our subsidiaries, agents, affiliates and suppliers employ adequate levels of security.

#### What are your rights in relation to your personal information?

You have certain rights in relation to your personal data, and we have summarised those that are relevant here. For more information on your rights, or if you wish to exercise any of them, please contact us (see the contact details at the bottom of this notice)

Rights	What does this mean?
1. The right to be informed	You have the right to be provided with clear, transparent and easily understandable information about how we use your information and your rights. This is why we're providing you with the information in this Privacy Notice.
2. The right of access	You have the right to obtain access to your information (if we're processing it), and certain other information (similar to that provided in this Privacy Notice).

	This is so you're aware and can check that we're using your information in accordance with data protection law.
3. The rights to rectification and erasure	You are entitled to have your information corrected if it's inaccurate or incomplete. In limited circumstances you will have a right to have information erased (known as the right to be forgotten).
4. The right to restrict processing	You have the right to restrict some processing of your personal information, which means that you can ask us to limit what we do with it;
5. The right to object to processing	You have the right to object to certain types of processing, including processing based on our legitimate interests in some cases.
6. The right to lodge a complaint	<p>You are able to submit a complaint to the Information Commissioner's Office about any matter concerning your personal information, using the details below. However, we take our obligations seriously, so if you have any questions or concerns, we would encourage you to raise them with us first, so that we can try to resolve them.</p> <p>Office of the Information and Data Protection Commissioner, Level 2, Airways House, High Street, Sliema SLM 1549, Malta</p> <p>Tel (+356) 2328 7100, <a href="http://www.idpc.org.mt">www.idpc.org.mt</a></p>
7. The right to withdraw consent	If you have given your consent to anything we do with your personal data, you have the right to withdraw your consent at any time (although if you do so, it does not mean that anything we have done with your personal data with your consent up to that point is unlawful).

#### How will we handle a request to exercise your rights?

We'll respond as soon as we can. Generally, this will be within one month from when we receive your request but, if the request is going to take longer to deal with, we'll come back to you and let you know.

We usually act on requests and provide information free of charge, but may charge a reasonable fee to cover our administrative costs of providing the information for:

- baseless or excessive/repeated requests, or

- further copies of the same information.

Alternatively, the law may allow us to refuse to act on the request.

#### Questions?

If you have any questions about anything in this privacy notice, please contact data protection officer at [DPHR@kindredgroup.com](mailto:DPHR@kindredgroup.com).