

CLINIMED GROUP APPLICANT PRIVACY NOTICE

What is the purpose of this document?

Flexible Medical Packaging Limited is a "data controller". This means that we are responsible for deciding how we hold and use personal information about you. You are being sent a copy of this privacy notice because you are applying for work with us (whether as an employee, worker or contractor). It makes you aware of how and why your personal data will be used, namely for the purposes of the recruitment exercise, and how long it will usually be retained for. It provides you with certain information that must be provided under the General Data Protection Regulation ((EU) 2016/679) (GDPR).

Data protection principles

We will comply with data protection law and principles, which means that your data will be:

- Used lawfully, fairly and in a transparent way.
- Collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes.
- Relevant to the purposes we have told you about and limited only to those purposes.
- Accurate and kept up to date.
- Kept only as long as necessary for the purposes we have told you about.
- Kept securely.
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The kind of information we hold about you

In connection with your application for work with us, we will collect, store, and use the following categories of personal information about you:

- The information you have provided to us in your curriculum vitae and covering letter.
- The information you have provided on our application form, including name, title, address, telephone number, personal email address, place of birth, gender, employment history, qualifications and, if applicable, membership of professional organisations and your driving licence number.
- Any information you provide to us during an interview.
- Identification information such as your passport number, national insurance number, immigration status.
- Information from previous employers if you have provided them as referees.

We may also collect, store and use the following "special categories" of more sensitive personal information:

- Information about your race or ethnicity, religious beliefs, sexual orientation and political opinions.
- Information about your health, including any medical condition, health and sickness records.
- Information about criminal convictions and offences.

How is your personal information collected?

We collect personal information about candidates from the following sources:

- You, the candidate.
- The recruitment agency or agencies through which you submitted your application, from which we collect the information you provided on your application form, CV and meetings.
- Disclosure and Barring Service in respect of criminal convictions, where the role requires us to carry out such checks.

- Your named referees, from whom we collect the following categories of data: dates of employment, attendance record, assessment of performance, honesty, conduct, attitude, ability and reason for leaving.

The following data from third parties is from a publicly accessible source: LinkedIn candidate search (if applicable).

How we will use information about you

We will use the personal information we collect about you to:

- Assess your skills, qualifications, and suitability for the work or role.
- Carry out background and reference checks, where applicable.
- Communicate with you about the recruitment process.
- Keep records related to our hiring processes.
- Comply with legal, regulatory and reporting requirements.

It is in our legitimate interests to use this personal information in order to decide whether to appoint you, since it would be beneficial to our business to appoint someone to the role or work for which you have applied.

We also need to process your personal information to decide whether to enter into a contract with you.

Our recruitment process is generally:

- consideration of your CV and/ or application form, and any covering letter and a decision as to whether or not to interview;
- reviewing the information provided at interview in order to assess whether or not to make you an offer of work , or take you to a second interview;
- at the interview stage, we may invite you to take an aptitude test
- on your acceptance of an offer of work, we will take up references from the referees whose details you provided us with and, if relevant to the job you will be carrying out, carry out DBS checks.

If you fail to provide personal information

If you fail to provide information when requested, which is necessary for us to consider your application (such as evidence of qualifications or work history), we will not be able to process your application successfully. For example, if we require a DBS check or references for this role and you fail to provide us with relevant details, we will not be able to take your application further.

How we use particularly sensitive (“special categories”) personal information

We will use your special categories personal information in the following ways:

- We will use information about your disability status to consider whether we need to provide appropriate adjustments during the recruitment process, for example whether adjustments need to be made during a test or interview.
- We will use information about your immigration status to ensure that we are legally permitted to make you an offer of work or employment.
- We will use information about your race or national or ethnic origin, religious, philosophical or moral beliefs, or your sexual life or sexual orientation, to ensure meaningful equal opportunity monitoring and reporting.

Information about criminal convictions

We will collect information about criminal convictions history if we would like to offer you a role which requires us to carry out such checks, generally where the role may involve contact with vulnerable people. In such a case, we are required to carry out a criminal records check in order to satisfy ourselves that there is nothing in your criminal convictions history which makes you unsuitable for the role.

Automated decision-making

You will not be subject to decisions that will have a significant impact on you based solely on automated decision-making.

Data sharing

Why might you share my personal information with third parties?

We will only share your personal information with the following third parties for the purposes of processing your application:

- the recruitment agency through which you applied for the role;
- any other CliniMed Group company to whom you make an application;
- if applicable to the role for which you applied, the Disclosure and Barring Service through an agency.
- if you are asked to undertake an aptitude test, Thomas International;
- government authorities if required for the purposes above, if mandated by law or if required for the protection of our legitimate interests in compliance with applicable laws.

All our third-party service providers and other entities in the group are required to take appropriate security measures to protect your personal information in line with our policies. We do not allow our third-party service providers to use your personal data for their own purposes. We only permit them to process your personal data for specified purposes and in accordance with our instructions.

Data security

We have put in place appropriate security measures to prevent your personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal information to those employees, agents, contractors and other third parties who have a business need-to-know. They will only process your personal information on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected data security breach and will notify you and any applicable regulator of a suspected breach where we are legally required to do so.

Data retention

How long will you use my information for?

If you are successful in your application and enter into a contract of employment with us or are engaged by us as a worker, then the information you have provided during the application process, as described above, will form part of your personnel file and you will be given a copy of our Employee or Worker Privacy Notice.

If your application is unsuccessful, then we will retain your personal information for a period of twelve (12) months after we have communicated to you our decision not to engage you. We retain your personal information for that period so that we can show, in the event of a legal claim, that we have not discriminated against candidates on prohibited grounds and that we

have conducted the recruitment exercise in a fair and transparent way. After this period, we will securely destroy your personal information in accordance with applicable laws and regulations.

If we wish to retain your personal information on file, on the basis that a further opportunity may arise in future and we may wish to consider you for that, we will write to you separately, seeking your explicit consent to retain your personal information for a fixed period on that basis.

Rights of access, correction, erasure, and restriction

Your rights in connection with personal information

Under certain circumstances, by law you have the right to:

- **Request access** to your personal information (commonly known as a "data subject access request"). This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it.
- **Request correction** of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.
- **Request erasure** of your personal information. This enables you to ask us to delete or remove personal information where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal information where you have exercised your right to object to processing (see below).
- **Object to processing** of your personal information where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground. You also have the right to object where we are processing your personal information for direct marketing purposes.
- **Request the restriction of processing** of your personal information. This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it.
- **Request the transfer** of your personal information to another party.
If you want to review, verify, correct or request erasure of your personal information, object to the processing of your personal data, or request that we transfer a copy of your personal information to another party, please contact the Group Director of Legal Services, in writing.

Responsible person

The Group Director of Legal Services is responsible for overseeing compliance with this privacy notice. If you have any questions about this privacy notice or how we handle your personal information, please contact her on 01628 402380. You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues. www.ico.org.uk