

FOUNDED IN 1997

HOLROYD HOWE

FEEDING INDEPENDENT MINDS

RECRUITMENT AND SELECTION PRIVACY NOTICE

INTRODUCTION

1. When you apply for a role with one of our brands (whether as an employee, worker, or contractor), we need to know certain information about you. This Privacy Notice explains the type of information we will process about you during the recruitment and selection process, why we are processing it and how that processing may affect you.
2. References in the Privacy Notice to employment, work (and similar expressions) include any prospective arrangement we may have under which an individual provides us with work or services.

WHAT PERSONAL INFORMATION WE MAY HOLD AND WHY WE PROCESS IT

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

PURPOSE	EXAMPLES OF PERSONAL INFORMATION THAT MAY BE PROCESSED	GROUNDS FOR PROCESSING
Recruitment and Selection	<p>Standard data related to your identity (e.g. your name, address, email address, ID information and documents, telephone numbers, place of birth, nationality and contact details); professional experience and education (including university degrees, academic records, professional licenses, memberships and certifications, awards and achievements, and current and previous employment details); financial information (including current salary information); language skills; and any other personal information that you present us with as part of your application related to the fulfilment of the role.</p> <p>Information concerning your application and our assessment, your references, any checks we may make to verify information provided or background checks and any information connected with your right to work.</p> <p>If necessary, we will also process information concerning your health, any disability, and any adjustments to working arrangements.</p>	<p>Contract</p> <p>Legal obligation</p> <p>Legitimate interests</p>

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HOW WE USE PARTICULARLY SENSITIVE PERSONAL INFORMATION

4. We will use your particularly sensitive 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 an interview.
 - Where applicable, we will use information about your race or national or ethnic origin, religious, philosophical, or moral beliefs, or your sexual orientation, to ensure meaningful equal opportunities monitoring and reporting.

INFORMATION ABOUT CRIMINAL CONVICTIONS

5. We may carry out criminal records check if we are entitled to do so to satisfy ourselves that there is nothing in your criminal convictions history which makes you unsuitable for the role to which you are applying (for example, for roles working in the financial sector or working with minors). In particular, we will carry out such checks where:
 - We are legally required to carry out criminal record checks for those carrying out a specific role for us.
 - The role is one which is listed on the Rehabilitation of Offenders Act 1974 (Exceptions) Order 1975 (SI 1975/1023) and is also specified in the Police Act 1997 (Criminal Records) Regulations (SI 2002/233) (or the equivalent pieces of law in the other countries in which we operate) so is eligible for either a standard or enhanced check from the Disclosure and Barring Service (or the equivalent vetting procedure in the other countries in which we operate).
 - The role requires a high degree of trust and integrity, so we would like to ask you to seek a basic disclosure of your criminal records history.

Where this is done, we will have in place an appropriate policy document and safeguards which we are required by law to maintain when processing such data.

HOW IS YOUR PERSONAL INFORMATION COLLECTED?

6. We collect personal information about you from the following sources:
 - You, the candidate.
 - Recruitment agencies, job boards, social networking sites, non-profit organisations (such as ELBA, BASE, Job Centre Plus) and learning and development organisations where you have provided them with your application details in the first place and who pass those details on to us.
 - Background check providers, where a particular role requires specific background checks to be undertaken. We will always let you know if these checks are going to be done.
 - Credit reference agencies, where a particular role requires credit checks to be undertaken. We will always let you know if these checks are going to be done.
 - Disclosure and Barring Service in the United Kingdom (or the equivalent service provider in other countries in which we operate) in respect of checking for criminal convictions (in accordance with the paragraph above).
 - Your named referees.

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HOW WILL WE USE INFORMATION ABOUT YOU?

7. We will use the personal information we collect about you to:
 - Assess your skills, qualifications, and suitability for the 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 or regulatory requirements.
8. Having received your CV and cover letter or your application form, we will process that information to decide whether you meet the basic requirements to be shortlisted for the role. If you do, we will determine whether your application is strong enough to invite you for an interview. If we decide to call you for an interview, we will use the information you provide to us at the interview to decide whether to offer you the role. If we decide to offer you the role, we will then take up references and/or carry out a criminal record and carry out any other checks before confirming your appointment.
9. It is in our legitimate interests to decide whether to appoint you to the role since it would be beneficial to our business to appoint someone to the role. We also need to process your personal information to decide whether to enter into a contract with you.

IF YOU FAIL TO PROVIDE PERSONAL INFORMATION

10. 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 credit 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.

WHAT IF YOU WANT US TO STORE YOUR CV FOR VARIOUS ROLES?

11. To help you to find or apply for roles with us, you do have the option of storing your CV in the SmartRecruiters Recruitment Portal (the "Portal"). If you store your CV there, it will be searchable by the WSH Talent Attraction and Resourcing Teams; they may contact you in relation to any roles which they think are suitable for you.
12. You also have the option of joining our Talent Pool in which case your CV and details will be searchable by our managers as well as the WSH Talent Attraction and Resourcing Team; either may contact you directly in relation to any roles which they think are suitable for you.
13. When you set up an account for our Portal, you will get a username and password. By logging in to your account, you may remove or update your CV and/or candidate details at any time. We will do our best to ensure that our people only use your up-to-date details available on the Portal.
14. You can delete all or some of your information from the Portal at any time via your account.

HOW DO WE KEEP YOUR PERSONAL INFORMATION SECURE?

15. 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

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process your personal information on our instructions and they are subject to a duty of confidentiality.

16. When you are using the Portal, we ask that you treat your account information confidentially and do not share this information with anyone. If we believe that your Portal account is being used by anyone other than you, we reserve the right to disable your account at any time.
17. Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal information, we cannot guarantee the security of your data when being sent / uploaded to our Portal. Once we receive your personal information though, we have security measures in place to protect it.
18. If you would like more information on these measures, please contact us on the details set out at "Contact Details" below.

HOW LONG DO WE KEEP YOUR PERSONAL INFORMATION?

19. We will retain your personal information for a period of 6 months after we have communicated to you our decision about whether to appoint you to work for us. 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 and selection exercise in a fair and transparent way. After this period, we will securely destroy your personal information in accordance with our data retention policy.
20. If you have an account with our Portal, we will retain your details on the Portal for as long as you are an active user of the Portal. Periodically, an audit will be conducted to identify those users with no activity for over six months. An email will be sent to those identified, asking if they wish their information to be retained or deleted. If we receive no response within two weeks or receive a request to delete, all information on these accounts will be removed. If it is confirmed that those receiving this request want their information retained, it will be retained until the next audit, whereupon the process will be repeated.
21. Applications for a specific vacancy or speculative enquiry received via an agency, email or post will be, if of interest, added by HR to the Portal whereupon you will receive an email requesting your agreement for this information to be used for this purpose. If agreement not given this information will be deleted.

AUTOMATED DECISION-MAKING

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

WHY WE MIGHT SHARE YOUR PERSONAL INFORMATION WITH THIRD PARTIES

23. We will only disclose your personal information outside of the WSH Group, if disclosure is consistent with a ground for processing on which we rely and doing so is lawful and fair to you.
24. We will disclose your data if it is necessary for our legitimate interests as an organisation or the interests of a third party (but we will not do this if these interests are over-riden by your interests and rights in particular to privacy). Where necessary, we will also disclose your personal information if you consent, where we are required to do so by law and in connection with criminal or regulatory investigations.

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25. Specific circumstances in which your personal information may be disclosed to third parties include:
- to other members of the WSH Group where necessary;
 - to recruitment agencies to discuss your application;
 - to clients on whose premises, you would work (but only with your permission to do so);
 - to law enforcement agency to respond to requests or where required by applicable laws, pursuant to court orders, or arbitral or tribunal orders or rules of procedure, or to government regulations departments or agencies or regulatory bodies (including disclosures to tax and employment authorities), employment and any other regulatory bodies);
 - on a confidential basis to our advisers for example to our lawyers for the purposes of seeking legal advice or to further the interests of the WSH Group in legal proceedings and to our accountants for auditing purposes;
 - on an aggregated and anonymised basis to relevant regulators as part of a formal request for diversity data.
26. All our third-party service providers 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 information for their own purposes. We only permit them to process your personal information for specified purposes and in accordance with our instructions.

ACCESS TO YOUR PERSONAL INFORMATION AND OTHER RIGHTS

27. We try to be as open as we reasonably can about the personal information that we process. If you would like specific information, just ask us.
28. You also have a legal right to make a “subject access request”. If you exercise this right and we hold personal information about you, we are required to provide you with information on it, including:
- giving you a description and copy of the personal information; and
 - telling you why we are processing it.
29. If you make a subject access request and there is any question about who you are, we may require you to provide information from which we can satisfy ourselves regarding your identity. We will provide you with any information you are entitled to within one calendar month of receipt of your request unless your request is particularly complex, in which case, we will let you know if we need more time.
30. As well as your subject access right, you may have a legal right to have your personal information rectified or erased, to object to its processing or to have its processing restricted. If you have provided us with data about yourself (for example your address or bank details), you have the right to be given the data in machine readable format for transmitting to another data controller. This only applies if the ground for processing is Consent or Contract.

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RIGHT TO WITHDRAW

31. When you applied for this role, you provided consent to us processing your personal information for the purposes of the recruitment and selection exercise. You have the right to withdraw your consent for processing for that purpose at any time. To withdraw your consent, please log-in to your account to withdraw your application if you applied through the Portal or contact your main contact in our business if you sent your CV in directly. Once we have received notification that you have withdrawn your consent, we will no longer process your application and, subject to our retention policy, we will dispose of your personal information securely.

CONTACT DETAILS

32. Questions, comments, and requests regarding your personal information are welcomed. If you have queries or complaints relating to our processing of your personal information, you should raise these with your main contact in our business in the first instance, or by writing to us at WSH, 300 Thames Valley Park Drive, Reading RG6 1PT or you can contact our Data Protection Team by email on dataprotection@wshlimited.com.
33. You may also raise complaints with the relevant data protection authority. For the countries in which we operate, please see as follows:

United Kingdom The statutory regulator in the United Kingdom is the Information Commissioner's Office (ICO). Further information, including contact details, is available at <https://ico.org.uk>.

Belgium The statutory regulator in Belgium is the Data Protection Authority (Gegevensbeschermingsautoriteit); further information can be found on their website: www.dataprotectionauthority.be.

The Netherlands The statutory regulator in The Netherlands is the Dutch Data Protection Authority (Autoriteit Persoonsgegevens); further information can be found on their website: www.autoriteitpersoonsgegevens.nl.

Ireland The statutory regulator in Ireland is the Data Protection Commissioner; further information can be found on their website: www.dataprotection.ie.

Norway The statutory regulator in Norway is the Norwegian Data Protection Authority (Datatilsynet); further information can be found on their website: www.datatilsynet.no.

France The statutory regulator in France is CNIL (The Commission nationale de l'informatique et des libertés); further information can be found on their website: www.cnil.fr.

STATUS OF THIS NOTICE

34. This notice may be amended by us at any time. Nothing in this notice is intended to create an employment relationship between us and any non-employee providing services to us.

This Recruitment and Selection Privacy Notice was last updated on 03 February 2023.

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