STM Privacy Notice for Candidates

Application for Employment As part of our recruitment process, STM Group (UK) Ltd collects and processes personal data relating to job applicants.

Our Organisation is committed to being transparent about how we collect and use this data to ensure we are meeting our General Data Protection Regulation obligations. Please ready through the below information which is in line with the GDPR guidelines. Should you be happy to proceed with how we process your data please tick the opt in box in the accompanying email.

1.**The Purpose of this Privacy Notice**

STM Group (UK) Ltd is committed to protecting the privacy and security of your personal information. This privacy notice describes how we collect and use personal information about you prior to, your working relationship with us, in accordance with the General Data Protection Regulation (GDPR).

1.1. It applies to all applicants. This notice does not form part of any contract of employment or other contract to provide services.

1.2. We may update this notice at any time.

1.3. It is important that you read this notice, together with any other privacy notice we may provide on specific occasions when we are collecting or processing personal information about you, so that you are aware of how and why we are using such information.

2. **Data Controller**

STM Group (UK) Ltd is a "data controller". This means that we are responsible for deciding how we hold and use personal information about you. We are required under data protection legislation to notify you of the information contained in this privacy notice.

3. **Data Protection Principles**

We will comply with data protection law. This says that the personal information we hold about you must be:

3.1. Used lawfully, fairly and in a transparent way.

3.2. Collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes.

3.3. Relevant to the purposes we have told you about and limited only to those purposes.

3.4. Accurate and kept up to date.

3.5. Kept only as long as necessary for the purposes we have told you about.

3.6. Kept securely.

4. **What information about you we collect**

During our recruitment process, STM Group (UK) Ltd will collect and store a range of information about you. This information includes:

4.1. Your name, address and contact details, including email address and telephone number.

4.2. Details of your qualifications, skills, experience and employment history.

4.3. Information about your entitlement to work in the UK.

4.4. Whether or not you have a disability for which the organisation needs to make reasonable adjustments during the recruitment process.

5. How we collect your personal data

We collect personal information about applicants through the application and recruitment process, either directly from candidates or sometimes from an employment agency or background check provider. STM Group (UK) Ltd may collect this information in a variety of ways. For example, data might be contained in application forms, CVs, obtained from your passport and other forms of identification, or collected through interviews or other forms of assessment. We may also collect personal data about you from third parties, such as references supplied by former employers, job applications sent from job boards or welfare to work providers. Your personal data will be stored in a range of different places, including on our Application Tracking System and across our email systems. Should you be invited for an interview or assessment, your personal data will also be stored on interview notes, assessment documents and within your Right to Work documentation and other forms of identification.

Credit Reference and Affordability Checks

To help us assess applications, prevent fraud, and meet our legal and regulatory obligations, we may obtain information about you from credit reference agencies (CRAs). We obtain this information via **Creditsafe**, which uses its data partner **TransUnion** to supply consumer credit and identity data.

- **Creditsafe Business Solutions Limited** is authorised and regulated by the Financial Conduct Authority
  FCA Firm Reference Number: **742313**
- **TransUnion International UK Limited** is authorised and regulated by the Financial Conduct Authority
  FCA Firm Reference Number: **805757**

The information we receive may include data relating to your identity, credit commitments, payment history, and public record information. This data is used solely for legitimate business purposes, including creditworthiness assessment, identity verification, and fraud prevention, in accordance with applicable data protection laws.

Further information about how Creditsafe and TransUnion process your personal data can be found in their respective privacy notices:

- **Creditsafe Privacy / Transparency Notice**: *Transparency Notice | Customers & Suppliers*
- **TransUnion CRAIN (Credit Reference Agency Information Notice)**: https://www.transunion.co.uk/legal/privacy-centre/pc-credit-reference
- **TransUnion Bureau Privacy Notice**: https://www.transunion.co.uk/legal/privacy-centre/pc-bureau

6. How we use information about you?

We will only use your personal information when the law allows us to. Most commonly, we will use your personal information in the following circumstances to enable us to comply with legal obligations.

6.1. We are required to process your personal data for the purposes of contacting you for interview or assessment, to send out correspondence with regards to your application for employment and for recruitment monitoring purposes.

6.2. Making a decision about your recruitment or appointment.

6.3. Determining the terms on which you work for us if successful

6.4. Education, training and development requirements.

6.5. Complying with health and safety obligations.

6.6. To prevent fraud.

6.7. Equal opportunities monitoring.

6.8. We may also need to process your data to enter into a contract of employment with you, should your application for employment be successful.

6.9. In some cases, we need to process data to ensure that we are complying with our legal obligations. For example, it is mandatory to check a successful applicant's eligibility to work in the UK before employment can commence.

6.10. We may also need to process data from job applicants to respond to and defend against legal claims.

6.11. STM Group Ltd may process special categories of data, such as 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.

6.12. We may also collect information about your physical or mental health, or disability status, to ensure your health and safety in the workplace and to assess your fitness to work, to provide appropriate workplace adjustments

6.13 STM Group (UK) Ltd has a legitimate interest in processing personal data during the recruitment process and for keeping records of the process. Processing data from job applicants allows us to manage the recruitment process, assess and confirm a candidate's suitability for employment and make a decision on if we shall progress forward with making an offer of employment. We process such information to carry out our obligations and exercise specific rights in relation to employment. If your application is unsuccessful, STM Group Ltd may keep your personal data on file in case there are future employment opportunities for which you may be suited. We will ask for your consent before we keep your data for this purpose and you are free to withdraw your consent at any time.

7**. Change of purpose**

7.1. We will only use your personal information for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose.

7.2. If we need to use your personal information for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

7.3. Please note that we may process your personal information without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

8. **Who has access to your data?**

8.1. Your information may be shared internally for the purposes of our recruitment process. This includes members of the STM HR and Recruitment teams, interviewers involved in the recruitment process and Managers in the business area where there is a suitable vacancy.

8.2. We will not share your data with third parties other than with clients where this is a requirement to the performance of a contract, unless your application for employment is successful and we make you an offer of employment. We will then share your data with former employers to obtain references for you and employment background check providers to obtain necessary background checks.

9. **How does STM Group Ltd protect your data?**

9.1. We take the security of your data seriously and we have put in place measures to protect the security of your information. We have internal policies and controls in place to ensure that your data is not lost, accidentally destroyed, misused or disclosed, and is not accessed except by our employees in the proper performance of their duties.

9.2. Where we have to share your data with clients, as third parties they will only process your personal information on our instructions and where they have agreed to treat the information confidentially and to keep it secure to treat it in accordance with the law.

9.3. 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.

10. **For how long does STM Group Ltd keep your data?**

10.1. If your application for employment is unsuccessful, our organisation will hold your data on file for up to 12 months after the end of the relevant recruitment campaign. 10.2. At the end of that period or once you withdraw your consent, your personal data is deleted from our systems and any paper-based documentation is destroyed.

10.3. If your application for employment is successful, personal data gathered during the recruitment process will be transferred to your Human Resources file (electronic and paper based) and retained during your employment.

10.4. Information about criminal convictions. We may only use information relating to criminal convictions where the law allows us to do so. This will usually be where such processing is necessary to carry out our obligations and provided we do so in line with our Data Protection Policy.

10.5. Less commonly, we may use information relating to criminal convictions where it is necessary in relation to legal claims, where it is necessary to protect your interests (or someone else's interests) and you are not capable of giving your consent, or where you have already made the information public.

10.6. We may also process such information about members or former members in the course of legitimate business activities with the appropriate safeguards.

10.7. We will hold information about criminal convictions.

10.8. We will only collect information about criminal convictions if it is appropriate given the nature of the role and where we are legally able to do so. Where appropriate, we will collect information about criminal convictions as part of the recruitment process, or we may be notified of such information directly by you in the course of you working for us. We will use information about criminal convictions and offences in the following ways If you have a criminal record, it does not necessarily mean that you will not get a licence.

We will make our decision according to: Whether we consider your offences relevant to our business The actual sentence or disposal given to you for the offence and how recent the offences were.

11. **Rights of access, correction, erasure, and restriction Your duty to inform us of changes**

11.1. It is important that the personal information we hold about you is accurate and current. Please keep us informed if your personal information changes during your working relationship with us.

Your rights in connection with personal information

11.2. Under certain circumstances, by law you have the right to: 11.2.1. 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.

11.2.2. 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.

11.2.3. 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).

11.2.4. 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 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.

11.2.5. 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.

11.2.6. Request the transfer of your personal information to another party.

11.3. 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 STM HR Department in writing. Right to withdraw consent

11.4. In the limited circumstances where you may have provided your consent to the collection, processing and transfer of your personal information for a specific purpose, you have the right to withdraw your consent for that specific processing at any time. To withdraw your consent, please contact STM HR Department. Once we have received

notification that you have withdrawn your consent, we will no longer process your information for the purpose or purposes you originally agreed to, unless we have another legitimate basis for doing so in law.

12. **Data Protection Officer**

12.1. We have appointed a data protection officer (DPO) to oversee compliance with this privacy notice.

12.2. If you have any questions about this privacy notice or how we handle your personal information, please contact the DPO 12.3. 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.

13. **Changes to this privacy notice**

13.1. We reserve the right to update this privacy notice at any time, and we will provide you with a new privacy notice when we make any substantial updates. We may also notify you in other ways from time to time about the processing of your personal information.

13.2. If you have any questions about this privacy notice, please contact

STM Data Protection Officer gdpr@stmgroupltd.com