

## **Candidate Privacy Notice**

**Data controller: Edgetech UK Ltd** of Rowley Drive, Coventry CV3 4FG ('the Company')

As part of any recruitment process, the Company collects and processes personal data relating to job applicants. The Company is committed to being transparent about how it collects and uses that data and to meeting its data protection obligations.

This privacy notice describes how the Company collects and uses personal information about you during and after the application process, in accordance with the General Data Protection Regulation (GDPR) and UK data protection laws. This notice may be amended or updated at any time.

### **What information does the Company collect?**

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data). There are "special categories" of more sensitive personal data which require a higher level of protection.

The Company collects, stores and processes a range of personal information about you. This includes:

- your name, address and contact details, including email address and telephone number;
- details of your qualifications, skills, experience and employment history;
- information about your current level of remuneration, including benefit entitlements;
- whether or not you have a disability for which the Company needs to make reasonable adjustments during the recruitment process; and
- information about your entitlement to work in the UK including passport information, visa details, immigration permissions and travel information.
- Results of psychometric testing or bespoke assessments relevant to the position
- Assessment notes and scoring

The Company may collect this information in a variety of ways. For example, data might be contained in application forms, CVs or resumes, obtained from your passport or other identity documents, collected through interviews or other forms of assessment or through publically available resources such as LinkedIn.

The Company may also collect personal data about you from third parties, such as references supplied by former employers. The Company will seek information from third parties only once a job offer to you has been made.

Data will be stored in a range of different places, including on your application record, in HR management systems and on other IT systems (including email).

### **Why does the Company process personal data?**

The Company needs to process data to take steps at your request prior to entering into a contract with you. It may also need to process your data to enter into a contract with you.

In some cases, the Company needs to process data to ensure that it is complying with its legal obligations. For example, it is required to check a successful applicant's eligibility to work in the UK before employment starts.

The Company has a legitimate interest in processing personal data during the recruitment process and for keeping records of the process. The Company's legitimate interests include: operating its business efficiently; maintaining standards of service to its clients and improving diversity of opportunity. Processing data from job applicants allows the Company to manage the recruitment process, assess and confirm a candidate's suitability for employment and decide to whom to offer a job. The Company may also need to process data from job applicants to respond to and defend against legal claims.

Where the Company processes information which falls within "special categories" (which may include health information, trade union information, criminal record details and information about race, ethnic origin, religion or sexual orientation), this is because it is necessary for complying with its employment law obligations or for exercising its employment law rights or monitoring and improving equal opportunities.

In limited circumstances, the Company may approach you for your written consent to allow it to process certain specific information, in which case you will be provided with full details and your consent will be requested at that time. Employees are entirely free to decide whether or not to permit such processing and there are no consequences of failing to do so. Consent can be withdrawn at any time.

The Company will not use your data for any purpose other than the recruitment exercise for which you have applied, unless you have specifically consented on the application form to the Company retaining your application form for future vacancies.

### **Who do we share your personal data with?**

We may share any of your personal data that is relevant, where appropriate, with our parent company, Quanex, to enable them to input into the recruitment process and approve final recruitment decisions where appropriate. Our legal grounds for doing so are that: it is necessary for entry into a contract, and it is in our legitimate interest to have Quanex approval of our recruitment decisions and comply with the procedures applicable within our corporate group. Quanex is based outside the EEA, in the United States.

#### **Recruitment agencies**

We engage recruitment agencies to provide us with the details of suitable candidates for our available vacancies, to communicate with those candidates, to handle administration in connection with the recruitment process. If we have received your initial application details from a recruitment agency, we will share with them any of your personal data that is necessary to enable them to fulfil their functions for us. Our legal grounds for doing so are that: it is necessary for entry into a contract; and it is in our legitimate interest to engage service providers to assist us with the recruitment process.

#### **Medical/occupational health professionals**

We may share information relevant to any request by you for adjustments to the recruitment process as a result of an underlying medical condition or disability with medical/occupational health professionals to enable us to identify what, if any, adjustments are needed in the recruitment process and, if you are successful, once you start work. This information may also be used by the medical/occupational health professionals to carry out assessments required by health and safety legislation. Our legal grounds for sharing this personal data are that: it is necessary for entry into a contract; it is in our legitimate interests to consider adjustments to enable Job Applicants to participate fully in the recruitment process and to assess the fitness for work of Job Applicants to whom we have offered jobs; and it is necessary to comply with our legal obligations/exercise legal rights in the field of employment (obligations not to discriminate, to make reasonable adjustments, to comply with health and safety requirements).

#### **Legal/professional advisers**

We share any of your personal data that is relevant, where appropriate, with our legal and other professional advisers, in order to obtain legal or other professional advice about matters related to you or in the course of dealing with legal disputes with you or other Job Applicants. Our legal grounds for sharing this personal data are that: it is in our legitimate interests to seek advice to

clarify our rights/obligations and appropriately defend ourselves from potential claims; it is necessary to comply with our legal obligations/exercise legal rights in the field of employment; and it is necessary to establish, exercise or defend legal claims.

### **Home Office**

We may share your right to work documentation with the Home Office, where necessary, to enable us to verify your right to work in the UK. Our legal ground for sharing this personal data is to comply with our legal obligation not to employ someone who does not have the right to work in the UK.

### **Who has access to data?**

Your information may be shared internally for the purposes of the recruitment exercise. This includes members of the HR and recruitment team, interviewers involved in the recruitment process and managers of the business area where the vacancy or similar vacancy exists, senior managers and IT staff if access to the data is necessary for the performance of their roles.

The Company will not share your data with third parties, unless your application for employment is successful and it makes you an offer of employment. The Company will then share your data with former employers to obtain references for you and if applicable Immigration Services if further information is required as part of eligibility checks.

Your data may be transferred outside the European Economic Area (EEA) where requested to more senior Company representatives with an interest in the recruitment activity, or otherwise as required in order to enable the Company to achieve the objective for processing the data as described above. The Employer will only transfer your personal data outside the EEA if the third party recipient (a) is situated in a country that has been confirmed by the European Commission to provide adequate protection to personal information, or (b) has agreed (by way of written contract) to provide all protections to your personal information as required by data protection legislation.

### **How does the Company protect data?**

The Company takes the security of your data seriously. It has 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. Entrance to our premises is through a security door. Whilst employees have free access, visitors are required to notify our employees of their presence in order to gain access. The Company keeps data within specific filing cabinets with access being restricted to only those employees whose fundamental duty is the processing of the data. Electronic data also has restricted privileges and is protected via various IT policies, security technologies, and General Computing Controls (GCC). The IT policies and GCC's are available on the Quanex Qnet intranet and include a wide range of security standards, network access controls, security risk mitigation tools (firewalls, antivirus, network monitoring, etc.), and ongoing IT audit practices and third-party security assessments. The Company has a Data Protection Policy incorporating instructions if a breach occurs and training has been given to managers within the business.

### **For how long does the Company keep data?**

If your application for employment is unsuccessful, the Company will confidentially destroy your data after a period of 6 months, unless you have specified on your application form or via written communication that you agree to the Company holding your data for matching against future possible vacancies. If you agree to allow the Company to keep your personal data on file, the Company will hold your data on file for a further 18 months for consideration for future employment opportunities. At the end of that period or once you withdraw your consent, your data is deleted or destroyed.

If your application for employment is successful, personal data gathered during the recruitment process will be transferred to your personnel file and retained during your employment. The periods for which your data will be held will be provided to you in a new privacy notice.

## Your rights

As a data subject, you have a number of rights. You can:

- access and obtain a copy of your data on request;
- require the Company to change incorrect or incomplete data;
- require the Company to delete or stop processing your data, or limit such processing, for example where the data is no longer necessary for the purposes of processing or where you believe that the Company does not have a legal basis for doing so; and
- require the Company to send you, or another organization, certain types of personal information about you in a format that can be read by a computer.

You are also entitled to withdraw your consent to processing of your personal data, where processing is based on your consent.

If you would like to exercise any of these rights or if you have any questions about how the Employer processes your personal data, please contact [dataprivacy@edgetechig.co.uk](mailto:dataprivacy@edgetechig.co.uk) or write to the Financial Controller at Edgetech, Rowley Drive, Coventry, CV4 3FG. You will not have to pay a fee to access your personal data (or exercise any other right). However, the Company may charge a reasonable fee if your request is clearly unfounded or excessive. Alternatively, the Company may refuse to comply with the request in such circumstances.

If you believe that the Company has not complied with your data protection rights, you can complain to the Information Commissioner's Office ([www.ico.org.uk](http://www.ico.org.uk)), the UK supervisory authority for data protection issues.

## What if you do not provide personal data?

You are under no statutory or contractual obligation to provide data to the Company during the recruitment process. However, if you do not provide the information, the Company may not be able to process your application properly or at all.

## Automated decision-making

Recruitment processes are not based solely on automated decision-making.