



GREENHOUS GROUP (HOLDINGS) LIMITED RECRUITMENT DATA PROTECTION PRIVACY NOTICE

As part of any recruitment process, Greenhous collects and processes personal data relating to job applications. Greenhous is committed to being transparent about how we collect and use that data and to meeting our Data Protection obligations.

Greenhous 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.

If you have any questions regarding the contents of this Privacy Notice please contact the HR Department: recruitment@greenhous.co.uk

What information do we collect?

Greenhous collects a range of information about you. This includes:

- Your name, address and contact details (including your 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 we need to make reasonable adjustments during the recruitment process.
- Information about your entitlement to work in the UK.
- Contact details for employment references.
- Where relevant, details relating to your ability to drive, including whether you hold a driving licence, have been involved in an accident, and whether you have access to a vehicle.
- Whether or not you have a criminal record (excluding spent convictions that you are not obliged to divulge).
- Where relevant, whether there are any medical or other reasons that may prevent you from being considered for the role for which you have applied on health and safety grounds.
- Information for Equal Opportunities monitoring purposes (separated from your application and stored in an anonymised format).

Greenhous may collect this information in a variety of ways. E.g. data may be contained in job application forms, a CV or resumé submitted by you or a third party acting on your behalf, from your passport or other identity documents, from your driving licence or collected through interviews and/or other forms of assessment.

We may also collect personal data about you from third parties e.g. references supplied by former employers or educational institutions. We will seek information from third parties only once a job offer to you has been made and accepted by you.

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

Why does Greenhous process personal data?

We need to process data to take steps at your request prior to entering into a contract with you, if we wish to do so. We may also need to process your data to enter into a contract with you, if we wish to.

In some circumstances we need to process data to ensure we are complying with our legal obligations (for example, it is mandatory to ensure proof of right to work in the UK before employment can commence).

Greenhous 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 decide to whom to offer employment. We may also need to process data from job applicants in order to be able to respond to and defend against legal claims.

Greenhous may process special categories of data such as information about ethnic origin, sex, religious belief, age and disability to monitor recruitment statistics. We may also collect information about candidates' disabilities in order to make reasonable adjustments during the recruitment process. We process such information to carry out our obligations and exercise specific rights in relation to employment.

If your application is unsuccessful, Greenhous may keep your personal data on file in case there are future employment opportunities for which you may be suited. If you have provided your application speculatively, it will be retained for a period of twelve months. If you have applied for a specific vacancy and are unsuccessful, we will retain your data for a period of twelve months from the end of the recruitment process.

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, managers in the business area with a vacancy and IT staff if access to the data is necessary for the performance of their roles.

We will not share your data with third parties unless your application for employment is successful and we make you an offer of employment. We will then share your data with former employers and/or academic bodies to obtain references on you.

How will your data be protected?

Greenhous takes the security of your data very seriously. We have internal policies and controls in place to ensure that your data is not lost, accidentally destroyed, misused or disclosed, and that it is not accessed except by our employees in the proper performance of their duties.

How long will your data be retained?

If your application for employment is unsuccessful, Greenhous will hold your data on file for a period of 12 months after the end of the relevant recruitment process (or 12 months after the receipt of your application, whichever is longer). During this time we may consider you for future employment opportunities. At the end of that period, your data will be deleted and/or destroyed.

If your application or employment is successful, personal data gathered during the recruitment process will be transferred to your personnel file (electronic and paper based) and retained during your employment. The periods for which your data will be held will be provided to you in a new Privacy Notice.

What if you do not provide personal data?

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

Your legal rights

Under certain circumstances, you have rights under data protection laws in relation to your personal data. Those rights are listed below. Please contact us if you would like to exercise any of them. You have the right to:

- **Be informed** about the collection and use of your personal data.
- **Request access** to your personal data (a “data subject access request”). This means you can receive a copy of the personal data we hold about you and to check that we are lawfully processing it.
- **Request correction** of your personal data: this enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.
- **Request erasure of your personal data.** You can ask us to remove personal data where there is no good reason for us continuing to process it. You also have this right where you have successfully exercised your right to object to processing, where we may have processed your data unlawfully or where we are required to erase your personal data to comply with law. We may not always be able to comply with your request where there are particular legal reasons.
- **Object to processing** of your personal data where we rely on a legitimate interest basis and if the processing impacts on your fundamental rights and freedoms. In some cases, we may demonstrate that we have grounds to process your data which override your rights and freedoms.
- **Request restriction of processing.** You can ask us to suspend the processing of your personal data: if you want us to establish the data’s accuracy; where our data use is unlawful but you do not want us to erase it; where you need us to hold the data even if we no longer need it, to establish, exercise or defend legal claims; or you have objected to use of data but we need to verify whether we have overriding legitimate grounds to use it.
- **Request a data transfer.** We will provide to you, or your chosen third party, your personal data in a structured, commonly used, machine-readable format. This only applies to automated information which you provided consent for us to use or necessary to perform a contract with you.
- **Withdraw consent at any time** where we rely on consent to process your personal data. This will not affect the lawfulness of processing carried out before you withdraw your consent.

Exercising your rights

You will not have to pay a fee to access your personal data (or to exercise any other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure personal data is not disclosed to a person who has no right to receive it. We may also contact you to ask you to clarify your request to speed up our response.

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests in which case we will keep you updated.

Data Protection Officer contact details

For the purposes of the information we collect about you, Greenhouse is a data controller and is responsible for your personal data. If you have any questions about this privacy policy, including any requests to exercise your legal rights, please contact us, using the following details:

DataCo International UK Limited (Dataguard)
c/o One Peak Partners, 41 Great Pulteney Street 2nd floor
London W1F 9NZ
United Kingdom
[+44 20 3318 17 18](tel:+442033181718)
www.dataguard.co.uk

Dataguard was appointed our Data Protection Officer as of 15 May 2021.

You have the right to make a complaint to the Information Commissioner's Office (ICO) which is the UK supervisory authority for data protection issues (www.ico.org.uk). We would, however, like the opportunity to assist you with any concerns before you approach the ICO so please contact us in the first instance using the details above.