

## Candidate privacy policy

Ashtead Technology Limited (the Company) wants to ensure that it deals with any personal data submitted by job candidates in a way that protects candidates data and which complies with the law.

If you have submitted an application to work with us as an employee, worker or contractor (together employees), the Company becomes the “data controller” of that data. The Company is responsible for deciding how it holds, stores and uses (together processes) the personal information about you contained in a job application, CV or obtained during the application process.

You are being sent a copy of this privacy notice because you are applying for work with the Company, whether as an employee or as a contractor. This privacy notice sets out how and why your personal data will be used and how long the data will be retained by the Company. It provides the information that you are entitled to under the General Data Protection Regulation (GDPR).

## Data protection principles

The Company will comply with data protection law and principles. Your personal information 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 to those purposes;
- accurate and kept up to date;
- kept only as long as necessary for the purposes the we have told you about; and
- kept securely.

## Type of information

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

- information you have provided in your CV and any covering correspondence;
- information you have provided in any application form;
- any information you provide during an interview; and
- any other information which may be disclosed throughout the application process.

We may also process 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; and
- information about criminal convictions and offences.

## Collection of personal information

We collect personal information about candidates from the following sources:

- you, the candidate;
- any recruitment agency;
- your named referees; and
- data from third parties or from a publicly accessible source.

## How personal information will be used

We will only use the personal information collected about you to:

- assess your skills, qualifications, and suitability for the role;
- carry out background and reference checks, where required for the position;
- communicate with you about the recruitment process;
- keep records related to our hiring processes; and
- comply with any legal or regulatory requirements applicable to the position you have applied for.

It is in the interests of the Company to appoint applicants to positions or roles which are vacant and also to retain some data on persons who may be interested in applying for posts or work which may become available in the 12 months following your application. The Company also requires your personal data to assist in any decision to enter into a contract of employment or service with you.

The Company regards your CV, covering letters or e-mails, application forms and any test or examination results as information to be used in deciding whether you meet the requirements to be shortlisted for the role. If you are shortlisted, the Company will further review the information to decide 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 have provided and the information obtained in the interview, from skills tests and examinations (including medical examination where required) to decide whether to offer you the role or work. If we decide to offer you the role or work, we may then seek references and/or carry out a criminal record or other checks before confirming your appointment.

## Failure to provide personal information

If, when requested, you feel you do not wish to provide the information required to consider your application (such as evidence of qualifications or work history), we will not be able to process your application or make any decisions regarding your employment or engagement. For example, for some roles we require a health check (if you are applying for a role which involves travel or work offshore for example) so if you do not provide information on your health or refuse to allow us access to the results of a medical examination we may not be able to take your application further.

## Special categories of personal data

Special categories of particularly sensitive personal information require higher levels of protection. We need to have further justification for collecting, storing and using this type of personal information. The Company have in place an appropriate policy document and safeguards which are required by law to maintain when processing such data. We may process special categories of personal information in the following circumstances:

- if you have a disability, information about your disability status to consider whether we should or could reasonably provide appropriate adjustments during the recruitment process. That will include reasonable adjustments to tests or for interview;
- 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; and
- information regarding your health to ensure that you meet the health and fitness criteria for the role under consideration.

## Criminal convictions

We may collect information about criminal convictions history if you are a candidate for work or a role for which we are required to carry out a criminal records check to satisfy ourselves that there is nothing in your criminal convictions history which makes you unsuitable for the role.

We have in place an appropriate policy document and safeguards which we are required by law to maintain when processing such data.

## Automated decision making

Automated decision-making takes place when an electronic system uses personal information to make a decision without human intervention.

It is not envisaged that any decisions will be taken about you using automated processes. You will be notified in writing if the Company wish to use automated decision making in a particular situation.

## Data sharing

We will share your personal information only where it is necessary to progress your application for the role or position you have applied for. That may be the case where you have applied for a post, which involves travel offshore in which case we would share your information with the platform or installation operator, facilities managers, or other group companies. All our third-party service providers and other entities in the group are required to have appropriate security measures in place 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 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. Details of the measures we have taken may be obtained from the DPM.

We have put in place procedures to deal with any suspected data security breach. The Company is subject to legal obligations to notify you and the relevant regulator if we suspected a breach has occurred.

## Data retention

We will retain your personal information for a period of twelve [12] months after we have communicated our decision about your application. 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 and that we have conducted the recruitment exercise in a fair and transparent way. After that period, we will securely destroy your personal information in accordance with the relevant laws and regulations.

If we wish to retain your personal information on file, on the basis that a further opportunity may arise in future which we would wish to consider you for, we will write to you separately, seeking your confirmation that we may retain your personal information for an additional fixed period for consideration for future employment by the Company.

## Right of access, correction, erasure and restriction

Under certain circumstances, 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 it is lawfully being processed;
- request correction of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information the Firm holds 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;
- 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 to establish its accuracy or the reason for processing it; and
- 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 DPM in writing.

## Consent

Occasionally, we may seek your consent to processing your personal information for the purposes of the recruitment exercise. That will not often be the case but if we do seek your consent, you have the right to withdraw your consent at any time. Should you wish to withdraw a consent you have granted, please contact the DPM. Once we have received notification that you have withdrawn your consent, we will no longer process your application and, subject to our retention policy and we will dispose of your personal data securely.

## Data Protection Manager (DPM)

We have appointed a DPM to oversee compliance with this privacy notice.

The DPM is Peter Simpson and can be contacted by email at [peter.simpson@ashtead-technology.com](mailto:peter.simpson@ashtead-technology.com) or by phone on 01224 904861.

If you have any questions about this privacy notice or how the Firm handles your personal information, please contact the DPM. You have the right to make a complaint at any time to the Information Commissioner's Office, the UK supervisory authority for data protection issues.

## Changes to this privacy notice

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