

## **JOB CANDIDATE PRIVACY POLICY**

**Data controller:** ZHG (UK) Limited

**Data protection officer:** Julie McParland email - [dataprotection@zannagroup.com](mailto:dataprotection@zannagroup.com)

This notice is provided by ZHG (UK) Limited, (the “organisation”) Company Reg No 15106118, 132-134 Great Ancoats Street, Manchester. M4 6DE (“we”, “us” or “our”) and is addressed to all applicants applying for jobs with us through the website <https://zanna.ats.emea1.fourth.com> (the “Site”). It applies until you formally accept an offer of employment (if applicable) at which point our privacy notice, included in your offer of employment documents, will apply. Our data protection officer can be reached at [dataprotection@zannagroup.com](mailto:dataprotection@zannagroup.com). You have the right to lodge a complaint to the Information Commissioners’ Office if you believe that we have not complied with the requirements of the GDPR or DPA 18 with regard to your personal data. Contact Details: Information Commissioner’s Office, Wycliffe House, Water Street, Wilmslow. SK9 5AF. Tel 0303 123 1113.

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

### **Why We Collect Personal Data**

The organisation needs to collect and process data to take steps, at your request, prior to entering into a contract with you. It also needs to process your data to enter into a contract with you.

In some cases, the organisation 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 organisation 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 the organisation to manage the recruitment process, assess and confirm a candidate's suitability for employment and decide to whom to offer a job. The organisation may also need to process data from job applicants to respond to and defend against legal claims.

This notice relates to the personal data about you (and from which you can be identified) which you provide when you register for job vacancy alerts, create an account and/or apply for a job, through the Site, attend an interview where notes may be taken by a member(s) of our Talent Team. Your personal data belongs to you and it is your choice whether to provide this to us. In order to process your personal data we rely on your consent; you may withdraw this at any time (through the “account settings” section of the Site). However, please be aware that if you do this then (a) your account for the Site will be deleted; and (b) your data will be removed from any of your job applications which are currently in process. If you have only registered your mobile number for job vacancies on the Site, you may withdraw your consent by contacting our Data Protection Officer at [dataprotection@zannagroup.com](mailto:dataprotection@zannagroup.com)

### **Personal Data Processed**

We may obtain personal data about you including but not limited to:

- Personal details: given name(s), preferred name, title gender, date of birth, age, nationality, passport number, national insurance number;

- Contact details: home and work addresses and telephone numbers, mobile number, work and personal email addresses;
- Employment history including previous salary details;
- Information on whether you have a disability for which the organisation needs to make reasonable adjustments during the recruitment process
- Sensitive data - including information about your ethnic origin, sexual orientation, age, gender health, and religion or belief.

### **Use of Personal Data**

We will use and process this data for the purposes of: creating your account and profile for the Site; contacting you about any job which you have applied for through the Site; evaluating your application for any job which you have applied for through the Site; contacting you about vacancies (where you have signed up for these on the Site); where you specifically consent to this, adding your CV to our Talent Pool (see below for more details about what this involves). Where the organisation collects sensitive data this is done for the purposes of equal opportunities monitoring with the explicit consent of job applicants, which can be withdrawn at any time by contacting [dataprotection@zannagroup.com](mailto:dataprotection@zannagroup.com)

We will share the personal data which you disclose to us with our chosen third party sub processors who process data on our behalf to allow us to review and evaluate your job applications including performing right to work checks and creating and sending contracts for signature; these include hosting providers, site software providers, providers of electronic signature functionality and providers of right to work checks. Our subprocessors include Fourth Limited, who provide the software associated with the Site, and TrustID Limited, who assist with right to work checks. Where our subprocessors are based outside the European Union we will transfer your data in accordance with the provisions of applicable privacy law (including the GDPR 2016/679 and the Data Protection Act 2018). Please contact our Data Protection officer for details of the appropriate safeguards applied in each case.

### **Retention of Data on the Site**

We will keep your account data for so long as your account is active, and for 6 months after the date of your last login. Where you submit a CV, we will keep this for up to 6 months after the date of your application, irrespective of whether you are successful (and may keep for longer if you elect to be part of our Talent Pool, see below). Data subject requests (including a request to delete your account) may be submitted through the “account settings” section of your account.

Where you sign up for text alerts about job vacancies, we will keep the details of your phone number for 3 months, after which time such data will be deleted. If you would like your phone number to be deleted prior to the end of the standard 3 month period (or for any other data subject requests in relation to such data) please contact our Data Protection Officer at the email address in the first paragraph above.

Once data is deleted it will cycle through our usual backup processes for a period.

### **Talent Pool**

Where you have elected to join our Talent Pool:

- all your personal data, including CV and all applications (live and closed) associated with your account will be retained in the Talent Pool until the earlier of (i) the date falling 12 months from the

date on which your CV is submitted to the Talent Pool, (unless at that point in time you consent to it remaining in the Talent Pool for another [6] month period); and (2) the date on which you request that your personal data is removed, which you may do by submitting a Data Subject request for deletion through the “accounts setting” section of the Site.

- all your personal data, including CV and all applications (live and closed) associated with your account will also be removed from the Talent Pool if and when an application is successful and you become an employee.

Note that the data retention for Talent Pool data described above is separate from, and independent of, the data retention policies which apply to your data which you submit to the Site (see above under “Retention of Data on the Site” for more detail on those retention periods).