

# Job Applicant Privacy Notice

## Version 4

This job applicant privacy notice sets out what personal data we, Hoover Limited and Haier Appliances UK Co Limited, (hereinafter referred to as Haier Europe) hold about you and how we collect and use it during and after the recruitment process. It applies to anyone who is applying to work for us or requesting information about recruitment, whether as an employee, worker, contractor, consultant, intern, volunteer, partner, director or enquirer (together referred to as ‘job applicant’ or ‘you’).

Please note that we will not necessarily hold, use or share *all* of the types of personal data described in this Privacy Notice in relation to you. The specific types of data about you that we will hold, use and share will depend on the role for which you are applying, the nature of the recruitment process, how far you progress in the recruitment process and your individual circumstances.

We are required by data protection law to give you the information in this Privacy Notice. It is important that you read the Privacy Notice carefully, together with any other similar or additional information that we might give you from time to time about how we collect and use your personal data. Should your application be successful, when you start work for us, we will provide you with access to our Employee Privacy Notice that explains how we deal with your personal data whilst you are working for us and after you have left.

This Privacy Notice applies from 1 January 2023, and supersedes any previous versions. It does not give you any contractual rights. We may update this Privacy Notice at any time.

### **Who is the controller?**

Haier Europe of 302 Bridgewater Place, Birchwood Park, Warrington, WA3 6XG is the “data controller” for the purposes of data protection law. This means that we are responsible for deciding how we hold and use personal data about you.

Haier Europe has appointed a Data Protection Officer (Contact: [data.protection@candy-group.com](mailto:data.protection@candy-group.com)), who is responsible for informing and advising us about our data protection law obligations and monitoring our compliance with these obligations. They also act as your first point of contact if you have any questions or concerns about data protection.

### **What is personal data?**

**Personal data** means any information relating to an individual who can be identified (directly or indirectly) in particular by reference to an identifier (e.g. name, NI number, employee number, email address, physical features). It can be factual (e.g. contact details or date of birth), an opinion about an individual’s actions or behaviour, or information that may otherwise impact that individual in a personal or business capacity.

Data protection law divides personal data into two categories: ordinary personal data and special

category data. Any personal data that reveals racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, physical or mental health conditions, sexual life or sexual orientation, or biometric or genetic data that is used to identify an individual is known as **special category data**. (The rest is **ordinary personal data**).

### What types of ordinary personal data do we hold about you and why?

At the initial stages of recruitment, we collect, hold and use the following types of ordinary personal data about you:

- Information contained in your application form/CV/covering letter, including but not limited to your name, title, contact details, employment history, experience, skills, qualifications/training (including educational, vocational, driving licences where appropriate), referees' names and contact details, etc
- Publicly available information about you, such as your social media presence
- Selection information, including correspondence, interview notes, internal notes, the results of any written or online selection tests and video interview footage
- Details of (if any) unspent convictions

If you are shortlisted for a position, or you receive a conditional offer of employment, we may collect, hold and use the following additional types of ordinary personal data about you:

- Pre-employment check information, including references and verification of qualifications
- Right to work checks and related documents

We hold and use this personal data so that we can:

1. Process your application and correspond with you about it
2. Assess whether you have the required skills, experience, qualifications and training for a role within the company
3. Verify information provided by you
4. Communicate with you via electronic mail about your application

The legal basis that legitimises the processing of personal data for the above-mentioned purposes is set out in Article 6, section 1, letter b) of EU and UK GDPR. In these cases, we need to process your personal data to take steps at your request in order to enter into a contract with you because by applying for a job with us you are effectively asking us to enter into a contract with you whether this is an employment contract, a contract for services or another type of contract.

5. Comply with law, check and demonstrate that you have the legal right to work in the UK and

## Ireland

The legal basis that legitimises the processing of personal data for the above-mentioned purpose is set out in Article 6, section 1, letter c) of EU and UK GDPR. In this case, we need to process your personal data to comply with a legal obligation, e.g. the obligation not to discriminate during our recruitment process, or the obligation not to employ someone who does not have the legal right to work in the UK and Ireland.

6. Transmit your personal data within the business group of which the Controller is a part for administrative purposes

The legal basis that legitimises the processing of personal data for the above-mentioned purpose is set out in Article 6, section 1, letter f) of EU and UK GDPR. In this case, we process your personal data for internal administrative purposes and your interests and fundamental rights do not override those interests.

7. Record the interview to make informed recruitment decisions and keep appropriate records of our recruitment process and decisions

The legal basis that legitimises the processing of personal data for the above-mentioned purpose is set out in Article 6, section 1, letter f) of EU and UK GDPR. We process your personal data to improve our recruiting standards and reduce costs and your interests and fundamental rights do not override those interests. You can object at any time to processing of your personal data for this purpose without detriment. In this case, Haier Europe shall provide you with equivalent arrangements for the interview.

### **What type of special category personal data do we hold about you, why, and on what legal grounds?**

We will only collect, hold and use limited types of special category data about you during the recruitment process, as described below.

Since special category data is usually more sensitive than ordinary personal data, we need to have an additional legal ground (as well as the legal grounds set out in the section on ordinary personal data, above) to collect, hold and use it. The additional legal grounds that we rely on to collect, hold and use your special category data are explained below for each type of special category data.

At the initial stages of recruitment, we collect, hold and use the following special category data about you:

## **Equality, Diversity & Inclusion Monitoring (EDI)**

Equality, Diversity & Inclusion Monitoring data which could include information about your race or ethnicity, religious beliefs, sexual orientation or health. We use this information to monitor equality of opportunity and diversity in our recruitment process. Our additional legal ground for using this information is that it is necessary in the public interest for the purposes of Equality, Diversity and Inclusion Monitoring and is in line with our Data Protection Policy.

## **Adjustments for disability/medical conditions**

Information relevant to any request by you for adjustments to the recruitment process as a result of an underlying medical condition or disability. We use this information to enable us to carry out a fair, non-discriminatory recruitment process by considering/making reasonable adjustments to our process as appropriate. Our additional legal ground for using this information is that we need it to comply with a legal obligation/exercise a legal right in relation to employment – namely, the obligations not to discriminate, and to make reasonable adjustments to accommodate a disability and/or medical condition(s) – and such use is in line with our Data Protection Policy.

## **Criminal records information/DBS Checks/ Garda National Vetting Bureau (GNVB)**

Where you are applying for a job that is on the excepted occupations list under the Rehabilitation of Offenders Act 1974, or the Criminal Justice (Spent Convictions and Certain Disclosures) Act 2016, (Ireland) we may request your criminal records. We may ask you to disclose if you have any criminal convictions and/or we may ask you to seek a basic criminal record check from the DBS and/or GNVB and disclose the results to us. Where we seek this information, we use it to assess your suitability for the role and this is necessary because you may come into contact with members of the public including minors and/or vulnerable adults in their home. For jobs that are on the excepted occupations list, our additional legal ground for using this information is that it is necessary for compliance with a legal obligation/exercise of a legal right in relation to employment. In all other cases, our additional legal ground for using this information is that you have given us your explicit consent to do so.

If you are shortlisted for a position, or you receive a conditional offer of employment, we may collect, hold and use the following additional types of special category personal data about you:

## **Pre-employment Health Questionnaires/Assessments/Medicals**

We collect information about your health in a pre-employment medical questionnaire and/or examination, as well as any information about underlying medical conditions and adjustments that you have brought to our attention. We use this information to assess whether you are fit to do the job with adjustments, to consider/arrange suitable adjustments and to comply with health and safety requirements. Our additional legal grounds for using this information will usually be that we need it to comply with a legal obligation/exercise a legal right in relation to employment – namely, the obligation

to make reasonable adjustments to accommodate a disability and/or medical condition(s)– and such use is in line with our Data Protection Policy. It may occasionally also be needed to assess your working capacity on health grounds, based on expert medical opinion and subject to obligations of confidentiality.

### **How do we collect your personal data?**

You provide us with most of the personal data about you that we hold and use, for example in your written application, by completing any assessments and during any interviews.

Some of the personal data we hold and use about you is generated from internal sources during the recruitment process. For example, the person interviewing you may score your suitability for the role and we record the reasons for decisions made about whether or not your application is successful.

Some of the personal data about you that we hold and use may come from external sources. For example, a recruitment agency provides us with a shortlist of candidates. If we offer you a role, we will carry out pre-employment checks, such as taking up references from past employers, character referees or education providers and we may check your qualifications by contacting the awarding body. We may ask an occupational health professional to report to us on your fitness to do the job. We may seek a criminal record check from the DBS and/or GNVB. In some circumstances, we may ask Government bodies for information about your immigration status to verify your right to work in the UK and Ireland. For some roles, we may also obtain information about you from publicly available sources, such as your LinkedIn profile, CV Databases or other media sources.

### **Who do we share your personal data with and on what legal grounds?**

#### **Parent/group companies**

We may share any of your personal data that is relevant with our parent/group companies to enable them to input into the recruitment process and approve final recruitment decisions. Our legal grounds for doing so are that: it is necessary for entry into a contract; and/or it is in our legitimate interest to obtain our parent/group company's approval of our recruitment decisions and comply with the procedures applicable within our corporate group.

#### **Recruitment agencies/third parties**

We engage companies who provide ancillary recruitment services such as:

- Psychometric assessment
- Video interviewing
- Recruitment consultancy
- Candidate communication e.g. SMS, WhatsApp, email, and live chat

If we have received your initial application details from a recruitment consultancy, 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/or it is in our legitimate interest to engage service providers to assist us with the recruitment process.

### **Medical and/or 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. We may also share details of disclosed medical conditions and/or answers to pre-employment health questionnaires with medical and/or occupational health professionals to seek a medical report about you to enable us to assess your fitness for the job and whether any adjustments would be needed if an offer is made. This information may also be used by the medical/occupational health professionals to carry out assessments required by health and safety legislation. Our ordinary legal grounds for sharing this personal data are that: it is necessary for entry into a contract; and it is in our legitimate interests to consider adjustments to enable job applicants to participate fully in the recruitment process.

Our additional special category legal ground for sharing this personal data is that 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). In addition, where we share your information in order to seek medical reports to assess your fitness for work after we have offered you a job, the processing may also be necessary for assessment of your working capacity based on expert medical opinion and subject to obligations of confidentiality.

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

We share any of your personal data that is relevant, where appropriate, with our legal and other professional advisers and our insurers, 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 ordinary legal ground for sharing this personal data is that it is in our legitimate interests to seek advice to clarify our rights/obligations and appropriately defend ourselves from potential claims. Where we share special category personal data, our additional legal grounds for doing so are that: it is necessary to comply with our legal obligations/exercise legal rights in the field of employment; and/or it is necessary to establish, exercise or defend legal claims.

### **Government bodies**

We may share your personal data, where necessary, to enable us to fulfil our legal obligation. Our legal ground for sharing this personal data is to comply with our legal obligations.

## **Your referees**

If you provide us with contact details for professional, educational and/or character referees, we may contact them to request information about your previous employment, education and their view as to your suitability for the role you have applied for with us. We will only share with them the details of the job you have applied for and such personal data as necessary to enable them to identify you. Our legal ground for sharing this personal data is that it is in our legitimate interests to verify your suitability for the role and ensure we engage the most suitable candidate.

## **Transferring personal data outside the EEA**

In compliance with the applicable regulations, the data may also be transferred abroad to countries not belonging to the European Economic Area.

In any case, you may obtain further information on the possible transfer of the data outside the European Economic Area by making a request to the Data Controller in the manner indicated in the following paragraphs.

## **Consequences of not providing personal data**

We ask you to provide personal data that we need to enable us to decide whether or not to offer you a role. If you do not provide particular information to us, then we will have to decide whether or not to offer you a role without that information, which in some cases could result in us deciding not to recruit you.

In addition, some of the personal data you provide to us is required by law. For example, if you do not provide us with the documentation we need to check your right to work in the UK and Ireland, then we cannot by law employ you.

If you choose not to provide us with personal data requested, we will tell/remind you about the implications of any such decision at the relevant time.

## **How long will we keep your personal data?**

We will keep your personal data throughout the recruitment process.

If your application is successful, then you will be able to access our Employee Privacy Notice. This will include information about what personal data we keep from the recruitment process and for how long.

If your application is unsuccessful, or if your application is successful but you decide not to accept our offer, we will keep your personal data for up to two years from the application date. There may, however, be circumstances in which it is appropriate for us to keep particular items of your personal data for longer. We will base these decisions on relevant circumstances considering the following criteria:



- The amount, nature, and sensitivity of the personal data
- The risk of harm from unauthorised use or disclosure
- The purposes for which we process your personal data and how long we need the particular data to achieve these purposes
- How long the personal data is likely to remain accurate and up to date
- For how long the personal data might be relevant to possible future legal claims
- Any applicable legal, accounting, reporting or regulatory requirements that specify how long certain records must be kept

If you change your mind about us keeping your personal data on file, you have the right to withdraw your consent at any time – see ‘Your rights’, below.

Personal data that is held on IT back-up data sets for disaster recovery purposes may also be retained for a longer period. In all cases, we will not keep your personal data for longer than we need it for our legitimate purposes.

## References

If you give us details of referees or other contacts, we require you to inform them about what personal data of theirs you are giving to us. You must also give them our contact details and let them know that they should contact us if they have any queries about how we will use their personal data.

## Your rights

You have a number of legal rights relating to your personal data, which are outlined here:

- **The right to request that we correct incomplete or inaccurate** personal data that we hold about you
- **The right to request that we delete or remove** personal data that we hold about you 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 data where you have exercised your right to object to processing (see below)
- **The right to object to our processing** your personal data where we are relying on our legitimate interest (or those of a third party), where we cannot show a compelling reason to continue the processing
- **The right to withdraw your consent to us using your personal data.** As described above, we do not normally rely on your consent as the legal ground for using your personal data. However, if

we *are* relying on your consent as the legal ground for using any of your personal data and you withdraw your consent, you also have the right to request that we delete or remove that data, if we do not have another good reason to continue using it

- **The right to request that we transfer** your personal data to another party, in respect of data that you have provided where our legal ground for using the data is that it is necessary for the performance of a contract or that you have consented to us using it (this is known as the right to ‘data portability’)
- **The right to make a subject access request.** This enables you to receive certain information about how we use your data, as well as to receive a copy of the personal data we hold about you and to check that we are lawfully processing it

If you would like to exercise any of the above rights, please contact the Data Protection Officer. The contact details are [Data.protection@candy-group.com](mailto:Data.protection@candy-group.com)

Note that these rights are not absolute and, in some circumstances, we may be entitled to refuse some or all of your request.

### United Kingdom

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. Details of how to contact the ICO can be found on their website: <https://ico.org.uk>

### Republic of Ireland

You have the right to make a complaint at any time to the Data Protection Commissioner (DPC), the Irish supervisory authority for data protection issues. Details of how to contact the DPC can be found on their website: <https://www.dataprotection.ie/en/contact/how-contact-us>