

Candidate Privacy Notice

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1. What is the purpose of this document?

SADA Systems UK Limited (“**SADA**”) is a "controller" in relation to personal data. This means that SADA is responsible for deciding how it holds and uses personal information about you. You are being sent a copy of this privacy notice because you are applying for work with SADA (whether as an employee, worker or contractor). It makes you aware of how and why your personal data will be used, namely for the purposes of the recruitment exercise, and how long it will usually be retained for. It provides you with certain information that must be provided under the UK General Data Protection Regulation (UK GDPR).

2. Data protection principles

SADA will comply with data protection law and principles, which means that your data will be:

- Used lawfully, fairly and in a transparent way.
- Collected only for valid purposes that SADA has clearly explained to you and not used in any way that is incompatible with those purposes.
- Relevant to the purposes SADA has told you about and limited only to those purposes.
- Accurate and kept up to date.
- Kept only as long as necessary for the purposes SADA has told you about.
- Kept securely.

3. The kind of information SADA hold about you

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

- The information you have provided to SADA in your curriculum vitae and covering letter.
- The information you have provided on SADA's application form, including name, title, address, telephone number, personal email address, date of birth, gender, employment history and qualifications.
- Any information you provide to SADA during an interview.
- SADA may also collect, store and use the following types 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.
 - ☐ Information about criminal convictions and offences.

4. How is your personal information collected?

SADA collects personal information about candidates from the following sources:

- You, the candidate.
- Any recruitment agency, from which SADA collects the following categories of data: your name, title, address, telephone number, personal email address, date of birth, gender, employment history and qualifications.
- **Certn (background check provider), from which SADA collects the following categories of data: ID verifications, criminal records check, employment verification.**
- Disclosure and Barring Service in respect of criminal convictions.
- Your named referees, from whom SADA collect the following categories of data: your employment history and qualifications.
- The following data from third parties is from a publicly accessible source such as a social media profile.

5. How SADA will use information about you

SADA will use the personal information SADA collect about you to:

- Assess your skills, qualifications, and suitability for the role.
- Carry out background and reference checks, where applicable.
- Communicate with you about the recruitment process.
- Keep records related to our hiring processes.
- Comply with legal or regulatory requirements.

It is in SADA's legitimate interests to decide whether to appoint you to the role since it would be beneficial to it to appoint someone to that role.

SADA also needs to process your personal information to decide whether to enter into a contract of employment with you.

Having received your CV, covering letter, supplementary materials, and/or your application form, SADA will then process that information to decide whether you meet the basic requirements to be shortlisted for the role. If you do, SADA will decide whether your application is strong enough to invite you for an interview. If SADA decides to call you for an interview, SADA will use the information you provide to SADA at the interview to decide whether to offer you the role. If SADA decides to offer you the role, SADA will then take up references **and/or** carry out a criminal record before confirming your appointment.

6. If you fail to provide personal information

If you fail to provide information when requested, which is necessary for SADA to consider your application (such as evidence of qualifications or work history), SADA will not be able to

process your application successfully. For example, if SADA require a credit check or references for this role and you fail to provide us with relevant details, SADA will not be able to take your application further.

7. How SADA use particularly sensitive personal information

SADA will use your particularly sensitive personal information in the following ways:

- SADA will use information about your disability status to consider whether SADA needs to provide appropriate adjustments during the recruitment process, for example whether adjustments need to be made during the recruitment process.
- SADA will use 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.

8. Information about criminal convictions

SADA envisages that SADA will process information about criminal convictions.

SADA will collect information about your criminal convictions history if SADA would like to offer you the role (conditional on checks and any other conditions, such as references, being satisfactory). SADA are required to carry out a criminal records check in order to satisfy ourselves that there is nothing in your criminal convictions history which makes you unsuitable for the role. In particular:

- **SADA are legally required to carry out criminal record checks for those carrying out roles that require access to sensitive information**
- **The role requires a high degree of trust and integrity since it may involve access to sensitive internal and customer data**

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

9. Automated decision-making

You will not be subject to decisions that will have a significant impact on you based solely on automated decision-making.

10. Data sharing

10.1 Why might you share my personal information with third parties?

SADA will only share your personal information with the following third parties for the purposes of processing your application: SADA and any other Group Company. All SADA's third-party service providers and other entities in the group are required to take appropriate security measures to protect your personal information in line with its policies. SADA does not allow its third-party service providers to use your personal data for their own purposes.

SADA only permit them to process your personal data for specified purposes and in accordance with our instructions.

11. Data security

SADA 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, SADA limit access to your personal information to those employees, agents, contractors and other third parties who have a business need-to-know. They will only process your personal information on SADA's instructions and they are subject to a duty of confidentiality. Details of these measures may be obtained from peopleops@sada.com.

SADA has put in place procedures to deal with any suspected data security breach and will notify you and any applicable regulator of a suspected breach where SADA are legally required to do so.

12. Data retention

12.1 How long will you use my information for?

SADA will retain your personal information for a period of three years after SADA have communicated to you its decision about whether to appoint you to the role. SADA retains your personal information for that period so that SADA can show, in the event of a legal claim, that SADA has not discriminated against candidates on prohibited grounds and that SADA has conducted the recruitment exercise in a fair and transparent way. After this period, SADA will securely destroy your personal information in accordance with its data retention policy.

If SADA wishes to retain your personal information on file, on the basis that a further opportunity may arise in future and SADA may wish to consider you for that, SADA will write to you separately, seeking your explicit consent to retain your personal information for a fixed period on that basis.

Rights of access, correction, erasure, and restriction

12.2 Your rights in connection with personal information

Under certain circumstances, by law 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 SADA hold about you and to check that SADA are lawfully processing it.
- **Request correction** of the personal information that SADA hold about you. This enables you to have any incomplete or inaccurate information SADA hold about you corrected.
- **Request erasure** of your personal information. This enables you to ask SADA to delete or remove personal information where there is no good reason for SADA continuing to process it. You also have the right to ask SADA 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 SADA 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. You also have the right to object where SADA is processing your personal information for direct marketing purposes.
- **Request the restriction of processing** of your personal information. This enables you to ask SADA to suspend the processing of personal information about you, for example if you want SADA to establish its accuracy or the reason for processing it.
- **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 SADA transfer a copy of your personal information to another party, please contact peopleops@sada.com in writing.

13. Right to withdraw consent

When you applied for this role, you provided consent on [date] to SADA processing your personal information for the purposes of the recruitment exercise. You have the right to withdraw your consent for processing for that purpose at any time. To withdraw your consent, please contact peopleops@sada.com. Once SADA has received notification that you have withdrawn your consent, SADA will no longer process your application and, subject to our retention policy, SADA will dispose of your personal data securely.

14. Data protection officer

SADA has appointed a privacy manager to oversee compliance with this privacy notice. If you have any questions about this privacy notice or how SADA handle your personal information, please contact peopleops@sada.com. You have the right to make a complaint at any time to the Information Commissioner's Office (ICO) who is responsible for data protection issues in the UK.

15. Revision History

Date	Name	Title	Version	Changes Made/Reason for Revision
28 JUN 2022	Tiffany Purto	Senior Corporate Counsel	1.0	Creation of policy

16. Acknowledgement of Receipt and Review

I, _____ (candidate name), acknowledge that on
 _____ (date), I received a copy of SADA's Candidate Privacy
 Notice and that I have read and understood it.

Signature

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Name

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