

APEM Group Privacy Notice

(For users of our careers site)

At APEM Group, we're committed to protecting and respecting your privacy.

This Privacy Notice explains when and why we collect personal information about people who visit our website, how we use it, the conditions under which we may disclose it to others and how we keep it secure.

We may change this Policy from time to time so please check this page occasionally to ensure that you're happy with any changes. By using our website, you're agreeing to be bound by this Policy.

Any questions regarding this Policy and our privacy practices should be sent by email to recruitment@apemltd.co.uk

Who are we?

APEM Group process personal data on behalf of the Group's subsidiary companies who are registered Data Controllers. Our aim is that your visit to our careers site is enjoyable and informative and that you will return to the site in the knowledge that the privacy of your information or personal data is secure. We recognise our responsibility for protecting the online privacy of your personal information.

Data Protection Principles

We will comply with data protection law. This says that the personal information we hold about you must 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 only to those purposes.
- Accurate and kept up to date.
- Kept only as long as necessary, for the purposes we have told you about.
- Kept securely.

What information do we collect about you?

We collect information in a variety of ways. For example, data might be collected through application forms, CVs or resumes; from correspondence with you; or through interviews, meetings or other assessments.

In some cases, we may collect personal data about you from third parties, such as references supplied by former employers and information from DBS/Disclosure Scotland/IRELAND? checks permitted by law (where this is a requirement of your role).

Application data will be stored in the recruitment system but may be transferred to other systems including other IT systems (including the organisation's email system).

During the application and selection process we obtain information about you when you use our website and careers portal, for example, when you create an online application or a profile to receive job alerts. This may include:

Personal Data

- Personal contact details such as name, address, email address, telephone number;
- Information about your nationality and entitlement to work in the UK;
- Information about unspent criminal convictions;
- Details of your qualifications, skills, experience and employment history, including start and end dates, with previous employers and with the organisation;
- Information about your remuneration;
- Details of any training or development you may be undertaking or may have completed;

Special Category Data

- Where we process special categories of personal data, such as information about ethnic origin, sexual orientation or health, we will always ask for your explicit consent before collecting this information.
- We use this special category data for the purposes of equal opportunities monitoring.
- Data that we use for these purposes is collected with the express consent of applicants and is anonymised before it is shared internally with businesses, with the Group or with statutory bodies for reporting purposes.
- You can choose not to supply this special category data, each question has a “prefer not to say option”
- This information is kept securely within the ‘equality and diversity’ section of our recruitment system and applicants can withdraw this information at any time using the self-service function in My Account which allows them to update their records.

Our Legal Basis for Processing

- Legitimate Interests with the purpose of entering into an employee contract with you (Contractual)
- 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
- process an application that you have made;
- to carry out our obligations arising from any contracts entered into by you and us;

Consent

- Where we process Special Category Data
- Where you have consented to receiving marketing communications from us.
- To obtain third party references

Legal Obligations

- In some cases, we need to process data to ensure that we are complying with our legal obligations. For example, we are required by law to check a person’s entitlement to work in the UK.

Legitimate Interests

- Ensure effective general HR and business administration;
- Respond to and defend against legal claims;
- Comply with equality and diversity monitoring and
- Maintain and promote equality in the workplace.

- Prevent fraud
- To conduct data analytics studies to review and better understand our application process and effectiveness of attraction campaigns.

Creating a Profile

To apply for a post you will need to register and create an account. When you create a profile, you will have access to the personal data we hold about you. You are responsible for keeping your personal data accurate. During the registration process and application process we may collect personal data, the data and reasons are listed below,

Process	Personal data collected	Reason
Account Profile	Name, email address	<ul style="list-style-type: none"> • To provide services to you. • To maintain our relationship with you where you are a user of our website • To answer your enquiries
Job Alerts	Email address	<ul style="list-style-type: none"> • To keep you informed about other roles you have selected an interest in. • To inform you about your application status
Request to keep you informed about developments at APEM which may be of interest to your career	Email address	<ul style="list-style-type: none"> • Consent to send you emails
Job applications	Name, Address, contact details such as email, telephone and additional information such as your notice period	<ul style="list-style-type: none"> • We will use this personal information for the purposes of contacting you when we shortlist and to invite you for interview.
Curriculum Vitae / CV	The personal data contained in your CV which you provide is submitted by you freely	<ul style="list-style-type: none"> • We use CV's to help shortlist candidates. • Your CV will be stored in our recruitment database. You can update your CV at any time, simply by following the same procedure to submit a new CV. Your old CV will automatically be archived providing the

		<p>submission details remain the same allowing you to apply for future vacancies using the same CV. You can delete, replace or amend your CV at anytime.</p>
<p>Equality, Diversity & Inclusion information</p>	<p>This will include ethnicity, disability, sexual orientation, gender identity</p>	<ul style="list-style-type: none"> • APEM Ltd is an equal opportunities employer and committed to diversity. This means that all job applicants and members of staff will receive equal treatment and that we will not discriminate on grounds of gender identity, ethnic origin, disability, sexual orientation or religion. • You provide special category data by choice. • As part of our commitment to equal opportunities we may from time to time use information provided by you for the purposes of diversity monitoring. All such information will be used on an anonymised basis.
<p>Criminal convictions</p>	<p>We will ask you to tell us about unspent criminal convictions</p>	<ul style="list-style-type: none"> • In the UK - The Rehabilitation of Offenders Act (1974) provides that certain convictions shall be regarded as “spent” after a certain period of time. You do not need to disclose convictions which are “spent” at the date you submit the application form.

		<ul style="list-style-type: none"> In Ireland – The Criminal Justice (Spent Convictions and Certain Disclosures) Act 2016 provides that certain convictions shall be regarded as “spent” after a certain period of time. You do not need to disclose convictions which are “spent” at the date you submit the application form.
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Who might we share and receive information about you?

Your information is held centrally by APEM Group, however data may be shared if there is a legitimate reason to do so in the management of the recruitment process. These reasons are listed below.

We will not sell, rent or share your information with external third parties for marketing purposes.

DBS/Disclosure Clearance

- In the UK if the post you submit an application for requires DBS clearance, you will need to agree for a DBS disclosure and consent to details of the disclosure being released to APEM’s authorised Officers to receive a copy of your DBS clearance. The DBS’s Code of Practice is available on request and can also be found at www.homeoffice.gov.uk.

References

- With your consent we will ask you for names and contact information for references. When you provide referees personal information for the purposes of contacting for a reference you consent to us collecting references.

Where we are required by law

- We may release personal information to regulatory or law enforcement agencies, if they require us to do so.
- We will only disclose your information where we are permitted and requested to do so by law.

Other entities within our Group

- We may share your information with other entities within the APEM Ltd Group where shared services are used to process your application.

Third parties

- Providers of background and other checking and vetting services, including Disclosure Scotland, the Disclosure and Barring Service and credit reference agencies

- IDSPs to carry out right to work in accordance with UK legislation, such as Trust ID
- Our careers application portal and websites.
- Cloud based service providers
- Recruiters including employment agencies.
- Psychometric Testing Partners

Where in the world is your information?

- Your personal information is stored on systems in the UK. But there may be some occasions as our technology services progress where your information may leave the UK either in order to get to another organisation or if it's stored in a system outside of the EU.
- We will always have additional protections on your information if it leaves the UK ranging from secure ways of transferring data to ensuring we have a robust contract in place with that third party.
- We will take all practical steps to make sure your personal information is not sent to a country that is not seen as 'safe' either by the UK or EU Governments.

How long will your personal information be held?

- Identifiable information you provide to us will be held for 12 months after an application has been submitted. You can update your account at any time and cancel it. We will then hold data that is still on your Account for a period of up to 12 months dependent upon the last successful submission of an application.
- Unidentifiable data provided by you, used for data monitoring and reporting purposes, will be retained as long there is a legitimate reason to hold this
- If you are a successful candidate and are offered and accept a position your personal information will be held on file as an employee and will be processed and held in line with our Employee Policies. It may also be transferred from our recruitment system to our HR system and other systems.

Your rights of access, correction, erasure and restriction

The law gives you a number of rights to control what personal information is used by us. We will deal with your request within one month from receiving your request and if we need additional information from you to identify you we will ask for this without undue delay.

As a data subject, you have a number of rights. You can:

- access and obtain a copy of your data on request;
- require the organisation to change incorrect or incomplete data;
- require the organisation to delete or stop processing your data, for example where the data is no longer necessary for the purposes of processing; and
- object to the processing of your data where the organisation is relying on its legitimate interests as the legal ground for processing.

We will handle requests without undue delay and within one month. If you would like to exercise any of these rights, please e-mail: recruitment@apemltd.co.uk

If you believe that we have not complied with your data protection rights, you can contact the Head of Legal in the first instance or you can lodge a complaint with the Information Commissioners Office <https://ico.org.uk>

How to tell us of a data breach

APEM takes responsibility to protect the personal information we hold about those with whom we work seriously. We are accountable for our processing and take necessary technical and operational steps to information security protections.

If you suspect your personal information or that of others may have been at risk of a data protection breach please e-mail: recruitment@apemltd.co.uk

Changes to this Privacy Notice

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

Cookie Policy

What data do you collect from my use of your careers site?

Use of 'cookies'

Like many websites, we use cookies to improve your experience of our website.

What's a cookie?

A cookie is a small text file that's stored on your computer. Cookies allow us to:

- distinguish you from other users of the website
- provide you with a good experience when you browse our website
- improve our site

Browser settings

You can usually control of most cookies through the settings on your web browser. To find out more about cookies, including how to see what cookies have been set and how to manage and delete them, visit allaboutcookies.org.