

## **APEM Group Privacy Notice and Cookie Policy**

### **(For users of our careers site and job applicants)**

#### **Scope and Overview**

APEM Group is committed to protecting the privacy and security of your personal data. This Privacy Notice describes how APEM Group and its subsidiaries, affiliates, and related entities (collectively, "APEM Group," "we," or "us") collect and process personal data about you during the application and recruitment process. This Privacy Notice applies to job applicants only.

This Privacy Notice describes the categories of personal data that we collect, how we use your personal data, how we secure your personal data, when we may disclose your personal data to third parties, and when we may transfer your personal data outside of your home jurisdiction. This Privacy Notice also describes your rights regarding the personal data that we hold about you and how you can access, correct, and request erasure of your personal data.

We will only process your personal data as described in this Privacy Notice unless otherwise permitted by applicable law. We take steps to ensure that the personal data that we collect about you is adequate, relevant, not excessive, and processed for limited purposes.

Any questions regarding this Notice should be sent by email to [recruitment@apemltd.co.uk](mailto:recruitment@apemltd.co.uk)

#### **Collection of Personal Data**

For purposes of this Privacy Notice, personal data means any information about an identifiable individual collected in connection with the recruitment process. APEM Group may collect personal data directly from you, as a job applicant, or may receive personal data from third parties, for example, in connection with a background, employment, or reference check, subject to your consent where required by law. Personal data excludes anonymous or de-identified data that is not associated with a particular individual. We may collect, store, and process the following categories of personal data in connection with our recruiting activities:

- Personal contact details such as name, title, addresses, telephone numbers, and personal email addresses. \*
- Work history and other relevant experience including information contained in a resume, CV, cover letter, or job application. \*
- Education information including degrees awarded, transcripts, and other information provided in support of the job application. \*
- Information collected during phone screenings and interviews.
- Details regarding the type of employment sought, desired salary, willingness to relocate, job preferences, and other information related to compensation and benefits. \*
- Reference information and information received from background checks, where applicable, including information provided by third parties.
- Information related to previous applications to APEM Group or previous employment history with APEM Group.
- Where permitted in local law: 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. You can choose not to supply this special category data, each question has a “prefer not to say” option.

- Any additional personal details that you otherwise voluntarily provide to us.

Certain personal data identified above with an (\*) are mandatory for selection purposes. Failure to provide this data may affect the processing and outcome of your application.

### **Use of Personal Data**

We only process your personal data as described in this Privacy Notice or as otherwise required or permitted by applicable law in connection with carrying out our application and recruitment process. We may process your personal data for the following legitimate business purposes:

- Identifying and evaluating job applicants, including assessing skills, qualifications, and interests.
- Verifying your information and carrying out employment, background, and reference checks, where applicable, subject to your consent where required by applicable law.
- Communicating with you about the recruitment process and your application.
- Keeping records related to our hiring processes.
- Creating and submitting reports as required by applicable laws or regulations.
- Complying with our legal, regulatory, or other corporate governance requirements.
- Analysing and improving our application and recruitment process.
- Complying with applicable laws, regulations, legal processes, or enforceable government requests.
- To protect the rights and property of APEM Group, other job applicants, employees, or the public, as required or permitted by law.

We will only process your personal data for the purposes for which we collected it unless otherwise required or permitted by applicable law. If we need to process your personal data for an unrelated purpose, we will provide notice to you and, if required by law, seek your consent. We may process your personal data without your knowledge or consent where required by applicable law or regulation.

### **Collection and Use of Sensitive Personal Data**

APEM Group 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.

The following categories of personal data may be considered sensitive under the laws of your jurisdiction and may receive special protection:

- Race or ethnic origin.
- Political opinions.
- Religious, philosophical, or moral beliefs.
- Trade union membership.
- Social welfare, sexual life, or sexual orientation.
- Physical or mental health or condition.
- Unlawful or objectionable conduct, criminal charges, or convictions.
- Biometric information.

- Genetic data.
- Gender identity

We may collect and process the following categories of sensitive personal data when you voluntarily provide them or we receive them from a third party with your consent, when relevant for a particular position and as permitted by applicable law:

- Physical or mental health or condition or disability status to determine appropriate workplace accommodations and evaluate fitness for a particular position.
- Race or ethnic origin to ensure meaningful equal opportunity monitoring and reporting.
- Unlawful or objectionable conduct, criminal charges, or convictions to evaluate fitness for a particular position.
- Age (by category)
- Gender
- Gender identity

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 within the APEM 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.

Where we have a legitimate need to process your sensitive personal data for purposes not identified above, we will only do so only after providing you with notice and, if required by law, obtaining your consent.

### **Data Sharing**

We will only disclose your personal data to third parties where required by law or to our employees, contractors, designated agents, or third-party service providers who require such information to assist us with administering the recruitment process, including third-party service providers who provide services to us or on our behalf. We may use third-party service providers for various purposes, including, but not limited to, obtaining employment verification and background checks. These third-party service providers may be located outside of the country in which you live or the country where the position you have applied for is located.

We require all our third-party service providers, by written contract, to implement appropriate security measures to protect your personal data consistent with our policies and any data security obligations applicable to us. We do not permit 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 in accordance with our instructions.

We may also disclose your personal data for the following additional purposes where permitted or required by applicable law:

- To other members of our group of companies (including outside of your home jurisdiction) for the purposes set out in this Privacy Notice and as necessary to administer the application and recruitment process.
- As part of our regular reporting activities to other members of our group of companies.

- To comply with legal obligations or valid legal processes such as search warrants, subpoenas, or court orders. When we disclose your personal data to comply with a legal obligation or legal process, we will take reasonable steps to ensure that we only disclose the minimum personal data necessary for the specific purpose and circumstances.
- To protect the rights and property of APEM Group, other job applicants, employees, or the public, as required or permitted by law.
- During emergency situations or where necessary to protect the safety of persons.
- Where personal data is publicly available.
- If a business transfer or change in ownership occurs.
- For additional purposes with your consent where required by law.

### **Cross-Border Data Transfers**

Where permitted by applicable law, we may transfer the personal data we collect about you to jurisdictions that may not be deemed to provide the same level of data protection as your home country for the purposes set out in this Privacy Notice. We have implemented data transfer agreements to secure the transfer of your personal data to other jurisdictions.

### **Data Security**

We have implemented appropriate physical, technical, and organizational security measures designed to secure your personal data against accidental loss and unauthorized access, use, alteration, or disclosure. In addition, we limit access to personal data to those employees, agents, contractors, and other third parties that have a legitimate business need for such access.

### **Data Retention**

Except as otherwise permitted or required by applicable law or regulation, we will only retain your personal data for as long as necessary to fulfill the purposes for which we collected it, including for the purposes of satisfying any legal, accounting, or reporting requirements. Under some circumstances we may anonymize your personal data so that it can no longer be associated with you. We reserve the right to use such anonymous and de-identified data for any legitimate business purpose without further notice to you or your consent.

If you are offered and accept employment with APEM Group, the personal data we collected during the application and recruitment process will become part of your employment record and we may use it in connection with your employment consistent with our employee personal data policies. If you do not become an employee, or, once you are no longer an employee of APEM Group, we will retain and securely destroy your personal data in accordance with our document retention policy and applicable laws and regulations.

### **Rights of Access, Correction, Erasure, and Objection**

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during the recruitment process. By law you may have the right to request access to, correct, or erase the personal data that we hold about you or object to the processing of your personal data under certain circumstances. If you want to review, verify, correct, request erasure of your personal data, or object to the processing of your personal data, you can do this through self service by accessing "Your Account" via our recruitment portal where you originally registered your application.

We will handle requests without undue delay and within timescales prescribed by any relevant supervisory authority. If you would like to exercise any of these rights, please e-mail: [recruitment@apemltd.co.uk](mailto:recruitment@apemltd.co.uk). Depending on the jurisdiction where you are located, some of these rights may not apply.

We may request specific information from you to help us confirm your identity, verify your rights, and respond to your request, including to provide you with the personal data that we hold about you, if applicable. Applicable law may allow or require us to deny your request, or we may have destroyed, erased, or made your personal data anonymous in accordance with our record retention obligations and practices. If we cannot respond to your request, we will inform you of the reasons why, subject to any legal or regulatory restrictions.

### **Right to Withdraw Consent**

Where you have provided your consent to the collection, processing, and transfer of your personal data, you may have the legal right to withdraw your consent under certain circumstances. To withdraw your consent, if applicable, contact us at [recruitment@apemltd.co.uk](mailto: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 updates. If we would like to use your previously collected personal data for different purposes than those we notified you about at the time of collection, we will provide you with notice and, where required by law, seek your consent before using your personal data for a new or unrelated purpose. We may process your personal data without your knowledge or consent where required by applicable law or regulation.

## **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 [www.allaboutcookies.org](http://www.allaboutcookies.org) . [s](#)