

# Privacy Notice for Talent Acquisition

ADARMA Ltd (“we”, “us” and/or “our”) is committed to protecting the privacy and security of your personal data. We are the data controller in respect of the personal data we process about you in relation to your role with us and are obliged by law to inform you about how we process your personal data.

This Privacy Notice describes how we collect and process your personal data during our talent acquisition process in accordance with all applicable data protection laws and regulations in the United Kingdom. This notice applies to you if you have made an application to work with us.

It is important that you read and retain this notice together with any other privacy notice we may provide on specific occasions when we are collecting or processing personal data about you. This will ensure you are aware of how and why we are using such information and what your legal rights are in relation to your personal data.

We may update this notice at any time, and should we do so, we will provide you with an updated copy where it is practical for us to do so. If you have any questions relating to this notice you may contact us using the details below:

## Our Registered Office:

3<sup>rd</sup> Floor Quay 1  
133 Fountainbridge  
Edinburgh  
EH3 9QG

enquiries@adarma.com

We process your personal data in accordance with the overarching principles and requirements set out in the in the UK General Data Protection Regulation and the Data Protection Act 2018 (‘Data Protection Law’). What this means is that Adarma processes your personal data in a way that is:

- Lawful, fair and transparent;
- Compatible with the purposes that we have told you about;
- Adequate and necessary, we only use the data we need to use for the reason we told you;
- Accurate and up to date;
- Not excessive, we only keep your data for as long as we need it; and
- Secure and protected.

This Privacy Notice will explain:

- The personal data we collect from you and other sources
- How we use your personal data
- What happens if you do not provide us with the personal data we request from you
- Our lawful basis for us our processing of your personal data
- With whom will we share your personal data
- Where will we store your personal data
- How long we will retain your personal data
- What we have put in place to keep your personal data secure
- What your rights are
- Your duty to inform us

## **Personal data we collect from you**

We collect and process some or all of the following types of information from you:

- Information that you provide when you apply for a role. This includes information provided through an online job site, via email, in person at interviews and/or by any other method.
- In particular, we process personal details such as name, email address, address, telephone number, date of birth, qualifications, experience, information relating to your employment history, skills experience that you provide to us, as well as your video in case you conduct your interview using the Video Interview feature.
- Any information you provide us within your CV.

- If you contact us, we may keep a record of that correspondence.
- A record of your progress through any hiring process that We may conduct.
- Details of your visits to our talent acquisition platform provider's Website including, but not limited to, traffic data, location data, weblogs and other communication data, the site that referred you to the provider's Website and the resources that you access.
- Special category data, including information about your background and criminal convictions, when we are carrying out pre-employment screening checks and we do so in accordance with our additional policy document.
- Special category data including any information about your health, which you may disclose in order that we can provide you with additional support during the talent acquisition process.

### **Personal data we collect from other sources**

We may process personal data from you made available via other publicly available sources such as LinkedIn and other social media profiles and jobsites or databases. We may also receive your personal data from a third party who recommends you as a candidate for a specific job opening or for Our business more generally.

### **How we use your personal data**

We use information held about you in the following ways:

- To consider your application in respect of a role for which you have applied.
- To consider your application in respect of other roles.
- To communicate with you in respect of the talent acquisition process.
- To enhance any information that We receive from you with information obtained from third party data providers.
- To find appropriate candidates to fill Our job openings.
- To help Our service providers and Partners (such as the job sites through which you may have applied) improve their services.
- To verify your identity and carry out requisite background checks.
- Depending on the role you are applying to, we may use your personal data to register you for a pre-employment assessment.

### **Automated decision making/profiling**

We may use technology to select appropriate candidates for us to consider based on criteria expressly identified by us, or typical in relation to the role for which you have applied. The process of finding suitable candidates is automatic; however, any decision as to who we will engage to fill the job opening will be made by our staff.

Depending on the nature of the role, you apply for at Adarma you may be required to undertake a technical assessment during the application process. If applicable, you will be invited to engage with ShowX Limited, a third-party services supplier to Adarma to complete this exercise. During this process, ShowX will process some personal information about you to register you and process your test. You can find ShowX's privacy notice here <https://showx.io/privacy-notice/>.

### **If You Fail to Provide Personal Data?**

ADARMA Ltd is required to process your personal data in order to facilitate the talent acquisition process and prior to entering into a contract with you. As stated above, our clients also require Us to undertake criminal vetting checks. Accordingly, if we are unable to hold and process your data – because you do not provide it or do not authorise us to hold it – it may not be possible to continue the talent acquisition process with you.

### **Lawful basis for processing**

We rely on legitimate interest as the lawful basis on which We collect and use your personal data. Our legitimate interests are the talent acquisition of staff for Our business.

Where you apply for a job opening through the any third party job sites, we will process your personal data on the basis that you have provided the third party with consent, which is freely given by you during the online application process, to disclose your personal data to us.

### **With whom will we share your personal data?**

As set out above, if you apply to work with Adarma, we may pass your information to Our third-party service providers, including third party data processors who provide us with our talent acquisition platform.

We use a third-party software supplier to provide us with a talent acquisition platform, to assist with our talent acquisition process and the provider processes personal information as a data processor on our behalf. Our provider is only entitled to process your personal data in accordance with our instructions.

Where you apply for a job opening posted by us, these privacy notice provisions will apply to our processing of your personal information in addition to our privacy notice, which has been provided to you separately or is available on our website.

Where you apply for a job opening via the application function on a job site or similar online service provider ("partner"), you should note that the relevant partner may retain your personal data and may also collect data from us in respect of the progress of your application. Any use by the partner of your data will be in accordance with the partner's privacy notice.

This technology allows us to search various databases – some publicly available and others not, which may include your personal data (include your CV or Resumé), to find possible candidates to fill our job openings. Where We find you in this way, we will obtain your personal data from these sources.

Where you have applied for a job opening through the Indeed Apply functionality, and where you have consented to this disclosure, we will disclose to Indeed certain personal data that we hold, including but not limited to a unique identifier used by Indeed to identify you, and information about your progress through our hiring process for the applicable job opening, as well as tangible, intangible, visual, electronic, present, or future information that we hold about you, such as your name, contact details and other information involving analysis of data relating to you as an applicant for employment (collectively "disposition data"). Indeed's Privacy Notice in respect of Indeed's use of the disposition data is available on Indeed's website.

Where you have applied to a job opening through another service provider, we may disclose data similar to the disposition data defined above to such service provider. The service provider shall be the data controller of this data and shall therefore be responsible for complying with all applicable law in respect of the use of that data following its transfer by Us.

ADARMA Ltd core functions e.g. Talent Acquisition, People, IT and Information Security and Risk works collaboratively in relation to service delivery. Accordingly, where appropriate for the purposes set out above, we will share your personal data with other members of ADARMA Ltd including the following team/roles: People, line managers and senior leadership, Legal, Finance, Service Delivery, Business Operations and IT. We may be required to share your information with Cifas who will use it to prevent fraud, other unlawful or dishonest conduct, malpractice, and other seriously improper conduct. If any of these are detected, you could be refused certain services or employment. Your personal data will also be used to verify your identity. Further details of how your information will be used by us and Cifas, and your data protection rights, can be found by emailing [enquiries@adarma.com](mailto:enquiries@adarma.com).

We will only share your personal data with third parties if we have a lawful basis to do so and, where third parties process personal data on our behalf, we ensure we have a contract in place. If we are required to share your personal data with third countries outside the EEA, we ensure that we have appropriate safeguards in place, prior to doing so.

#### **Where we store your personal data**

Where we store your personal data in Our own systems, it is stored within **EEA**. The data that We collect from you and process using third party service providers may be transferred to, and stored at, a destination outside the European Economic Area ("EEA"). It may also be processed by staff operating outside the EEA who work for Us or for one of Our suppliers. Such staff maybe engaged in, among other things, the fulfilment of your orders, the processing of your payment details and the provision of support services. By submitting your personal data, you agree to this transfer, storing or processing.

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

We will hold all the data for **18** months.

Your personal information will be deleted on one of the following occurrences:

- deletion of your personal information by you (or by another person engaged by the Customer); or receipt of a written request by you (or another person engaged by the Customer) to us.

## Security

We take appropriate measures to ensure that all personal data is kept secure including security measures to prevent personal data from being accidentally lost or used or accessed in an unauthorised way. We limit access to your personal data to those who have a genuine business need to know it. Those processing your information will do so only in an authorised manner and are subject to a duty of confidentiality.

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

Unfortunately, the transmission of information via the internet is not completely secure. Although We will do Our best to protect your personal data, we cannot guarantee the security of your data transmitted through any online means, therefore any transmission remains at your own risk.

In particular, your data may be accessible to i) our service provider's staff in the USA or ii) may be stored by our provider's hosting service provider on servers in the USA as well as in the EU. The USA does not have the same data protection laws as the United Kingdom. Where we work with service providers overseas, we always enter into data processing agreements. These data processing agreements are designed to help safeguard your privacy rights and give you remedies in the unlikely event of a misuse of your personal data.

If you would like further information, please contact Us (see 'Contact' below).

## Your legal rights

You have a number of rights under data protection law in relation to your personal information and if you want to exercise any of these rights, please contact us at [enquiries@adarma.com](mailto:enquiries@adarma.com) and we will be happy to help. These rights are as follows:

- **right to request access to your personal information** - you can request a copy of the personal information we hold on you;
- **right to request correction of your personal information** - if any personal information we hold on you is incorrect, you can request to have it corrected;
- **right to request erasure of your personal information** - you can ask us to delete your personal information in certain circumstances;
- **right to object to processing or restrict processing of your personal information** - you may object to our processing of your personal data in certain circumstances;
- **right not to be subject to automated individual decision-making and profiling** - you may object to our processing of your personal data in certain circumstances;
- **right to request the transfer of your personal information** - to provide you, or a third party you have chosen, with your personal information; and
- **right to withdraw consent** – where we process your data on the basis of consent, you can notify us that you want to withdraw consent any time.

If you have any data protection complaints, you may contact the Information Commissioner's Office (ICO) by post at Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF. Email: [casework@ico.org.uk](mailto:casework@ico.org.uk) Telephone: 0303 123 1113

We'd like to try and help with any concerns you may have before you contact the ICO, so please get in touch with [enquiries@adarma.com](mailto:enquiries@adarma.com) in the first instance.

| Template Version | Date       | Author                            | Change Status   | Next Review                             |
|------------------|------------|-----------------------------------|---|---|
| 1.0              | March 2021 | Morgan O'Neill                    | New policy  | March 2022                              |
| 1.1              | 12/11/21   | Morgan O'Neill                    | Annual review and update  | 12/11/22<br>(brought forward to 9/5/22) |
| 1.2              | 09/05/22   | Morgan O'Neill                    | Six monthly review and update to incorporate minor changes to processing. | 12/11/22                                |
| 1.3              | 5/6/22     | Emily Cotterill<br>Morgan O'Neill | Additional review and update after  | 12/11/22                                |

|     |         |                                |   |          |
|-----|---------|--------------------------------|---|----------|
|     |         |                                | new implementation<br>Additional updates to include pre-employment assessment.                            | 16/02/23 |
| 1.4 | 23/3/23 | Rachel Jarry / Emily Cotterill | Additional review after name change to talent acquisition, updates to ATS and removal of testing platform |          |