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## **JOB APPLICANT PRIVACY NOTICE**

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*In compliance with the EU General Data Protection Regulation, in force from 25 May 2018*

## \*Multimatic Job Applicant Privacy Notice

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This Job Applicant Privacy Notice ('Privacy Notice') sets out what personal data we retain about you and how we collect and use it, both during and after the recruitment process. This Privacy Notice applies to anyone who is applying to work for us, whether as an employee, contractor, agency worker, consultant, intern or other type of worker (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 job 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 another privacy notice for employees that explains how we deal with your personal data while you are working for us.

This Privacy Notice applies from 25 May 2018, when the EU General Data Protection Regulation comes into force. It does not give you any contractual rights. We may update this Privacy Notice at any time.

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

Multimatic is the "controller" for purposes of data protection law. This means that we are responsible for deciding how we hold and use personal data about you, including the way in which any personal data is processed. 'Processing' personal data means any activity that involves the use of personal data (e.g. obtaining, recording, holding, amending, retrieving, using, disclosing, sharing, erasing or destroying personal data). It also includes sending or transferring personal data to third parties.

We do not have an appointed Data Protection Officer, and are not obligated to appoint one. For purposes of overseeing, advising on, and administering compliance with the Data Protection Policy and the relevant data protection law/regulations, we will identify a Data Protection Lead within each division or facility, as appropriate. Usually, the Data Protection Lead will be a member

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\*For the purpose of this Privacy Notice, "Multimatic" means each of Multimatic Ltd. (UK), Multimatic CFT Limited (UK), MTCE Limited (UK), Multimatic Marketing & Service Centre GmbH (Germany), Multimatic Engineering Prague s.r.o. (Czech Republic) and their respective divisions, branches and offices. To the extent any personal data is shared with the Multimatic Corporate Office (Multimatic Inc. (Canada)), reference to Multimatic will also include Multimatic Inc.

of the HR department and will be the first point of contact on issues relating to data protection.

This Privacy Notice also covers how the Multimatic Corporate Office (Multimatic Inc.) holds and uses any personal data about you that we share with them. The Multimatic Corporate Office is based in Canada, outside the European Economic Area (EEA), but it applies the same high standards to data protection compliance as the EEA. The European Commission has issued a decision confirming that Canada provides an equivalent level of protection to personal data.

## What is personal data?

Personal data means any information about a living natural person that makes that person identifiable. This may include (but is not limited to):

- **identification information** (e.g. name, ID card, national identification/insurance numbers or equivalent (as applicable) and passport numbers, nationality, place and date of birth, gender, picture, IP address);
- **contact information** (e.g. postal address and e-mail address, phone numbers);
- **family situation** (e.g. marital status, number of children);
- **tax status** (e.g. tax ID, tax residence);
- **education and employment information** (e.g. places and dates of education, course taken, grades, degrees, designations; recruitment information, details of terms of employment, performance information, disciplinary and grievance matters)
- **payroll and accounting data** (e.g. pay and benefit details, working hours)
- **security data** (e.g. door access, CCTV, use of computers and other technology)

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 **special category data**. (The rest is **ordinary personal data**).

Personal data may be automated (e.g. electronic records such as computer files or in emails) or in manual records which are part of a filing system or are intended to form part of a filing system (e.g. structured paper files and archives).

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

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

- Information contained in your application form, resume/CV and covering letter, including your name, title, contact details, photograph, employment history, experience, skills, qualifications/training (including educational, vocational and driving licences where appropriate), reference names and contact details, etc.
- Publicly available information about you, such as your business social media presence
- Selection information, including correspondence, interview notes, internal notes, the results of any written or online selection tests

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:

- process your application and correspond with you about it;
- assess whether you have the required skills, experience, qualifications and training for a role within the company;
- make informed recruitment decisions;
- verify information provided by you;
- check and demonstrate that you have the legal right to work in the relevant country required by your job;
- keep appropriate records of our recruitment process and decisions;

## **What are our legal grounds for using your ordinary personal data?**

Data protection law specifies the legal grounds on which we can hold and use personal data.

We rely on one or more of the following legal grounds when we process your ordinary personal data:

- We need it to take steps, at your request, to enter into a contract with you (**performance of the contract**), 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.
- We need it 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 relevant country required by your job.

- It is necessary for our **legitimate interests** (or those of a third party) and your interests and fundamental rights do not override those interests. For example, it is in our legitimate interests to review and consider your personal data (as listed above) so that we can select the most appropriate candidate for the job.

## **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 (in addition to 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 may collect, hold and use the following special category data about you:

### **Equal opportunities monitoring**

Equal opportunities 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 equal opportunities 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 – the obligations not to discriminate, and to make reasonable adjustments to accommodate a disability – and such use is in line with our Data Protection Policy.

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/medicals**

We may 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/or to comply with health and safety requirements (as the case may be). Our additional legal grounds for using this information are that: we need it to comply with a legal obligation/exercise a legal right in relation to employment – the obligation to make reasonable adjustments to accommodate a disability (and such use is in line with our Data Protection Policy) and to assess your working capacity on health grounds, subject to appropriate confidentiality safeguards.

### **Criminal records information/checks**

We may request criminal records checks from the relevant authorities. We use this information to assess your suitability for the job and to verify information provided by you. Our additional legal ground for using this information is that you have given us your explicit consent to do so.

### **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 job 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 job, we will carry out pre-employment checks, such as taking up references from past employers 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 relevant authorities. In some circumstances, we may need to check your immigration status to verify your right to work in the relevant country required by your job. For some jobs, we may also obtain information about you from publicly available sources, such as your LinkedIn profile or other media sources.

### **Who do we share your personal data with?**

We may share your relevant personal data, where appropriate, with the Multimatic Corporate Office (Multimatic Inc.) in Canada to obtain their input in the recruitment process and, if applicable, approve final recruitment decisions. Our legal grounds for doing so are that: it is necessary for entry into a contract, and it is in our legitimate interest to obtain approval from the Multimatic Corporate Office for our recruitment decisions and to comply with the procedures applicable within our corporate group.

### **Recruitment agencies**

We engage recruitment agencies to provide us with the details of suitable candidates for our available vacancies, to communicate with those candidates, to handle administration in connection with the recruitment process. If we have received your initial application details from a recruitment agency, 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 it is in our legitimate interest to engage service providers to assist us with the recruitment process.

### **Medical/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. This information may also be used by the medical/occupational health professionals to carry out assessments required by health and safety legislation. Our legal grounds for sharing this personal data are that: it is necessary for entry into a contract; it is in our legitimate interests to consider adjustments to enable Job Applicants to participate fully in the recruitment process and to assess the fitness for work of Job Applicants to whom we have offered jobs; and 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).

### **Legal/professional advisers**

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

### **Immigration Authorities**

We may share your right to work documentation with certain immigration authorities, where necessary, to enable us to verify your right to work in the country required by your job. Our legal ground for sharing this personal data is to comply with our legal obligation not to employ someone who does not have the right to work in the relevant country required by their job.

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

We only ask you to provide personal data that we need to enable us to make a decision about whether or not to offer you a job. If you do not provide particular information to us, then we will have to make a decision on whether or not to offer you a job without that information. In some

cases, this could result in us deciding not to recruit you. For example, if we ask you to provide a certificate verifying a qualification relevant to the intended job, such as a current fork lift qualification for a material handler's job, and you do not, we will have to decide whether to recruit you without that information. If you do not provide us with names of references when asked, we will not usually be able to offer you the job. 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 country where your job is located, then we cannot employ you by law.

If you choose not to provide us with personal data requested, we will tell you about the consequences of your 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, when you start work for us you will be issued the Multimatic Employee Privacy Notice which includes information about what personal data we keep from the recruitment process and how long we keep your personal data while you are working for us and after you have left.

If your application is unsuccessful, we will keep your personal data for up to 3 months from the date of application. If you have asked us to consider you for future vacancies – see 'Will we keep your application on file?' below. There may, however, be circumstances in which it is appropriate for us to keep particular items of your personal data for longer periods of time.

We will base these decisions on relevant circumstances, taking into account the following criteria:

- the amount, nature, and sensitivity of the personal data
- the risk of harm from unauthorised use or disclosure
- the purpose for which we process your personal data, and how long we need the particular data to achieve this purpose
- how long the personal data is likely to remain accurate and up-to-date
- 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

In all cases, we will not keep your personal data for longer than we need it for our legitimate purposes.



## Will we keep your application on file?

If you are unsuccessful for the job for which you have applied, or if you sent us a speculative application, your personal data will, generally, be deleted or removed within 3 months after your application is received.

If, during the period that we have your personal data on file, you wish to apply for any particular vacancy that we have open, please contact us to make us aware of this – particularly, if it is not a close match with your previous experience or is in a different area of our business from a vacancy you applied for previously.

When applying for a particular job, there is no obligation for you to consent to us keeping your personal data on file for consideration for other positions. Your application for the particular job you are putting yourself forward for will not be affected.

However, if you wish to be considered for other future vacancies which you may be suited to, then you can instruct us to keep your data on file for up a period of 12 months.

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.

## References

If you give us the names and details of references, we require you to inform them of 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 questions about how we will use their personal data.

## Your rights

You have a number of legal rights relating to your personal data:

- **The right to make a subject access request.** This enables you to receive certain information about how we use your personal data, as well as to receive a copy of it and to check that we are lawfully processing it.
- **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 to continue 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 the legitimate interest of a third party) or where we cannot show a compelling reason to continue the processing
- **The right to request that we restrict our processing of your personal data.** This enables you to ask us to suspend the processing of personal data about you, for example, if you want us to establish its accuracy or the reason for processing it.
- **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 you or to another party, in a structured format. This right applies in respect of data that you have provided which is necessary for the performance of a contract or which you have consented to us using.

Note that these rights are not absolute and, in some circumstances, we may be entitled to refuse some or all of your request. If you would like to exercise any of the above rights, or if you have any questions or concerns about how your personal data is being used by us please contact the following:-

For Multimatic Ltd (including EU-Matic):-

Unit 40000  
Herald Avenue  
Coventry  
CV5 6UB  
email: [euhr@multimatic.com](mailto:euhr@multimatic.com)

For Multimatic CFT Limited:-

Gateway 11 Business Park  
Copper Smith Way  
Wymondham, Norfolk  
NR18 0WY  
email: [MCFTHR@cftech.co.uk](mailto:MCFTHR@cftech.co.uk)

For MTCE Limited (including Multimatic Niche Vehicles Europe, Multimatic Niche Products, Selective Pre-Preg (SPP) and Multimatic Motorsports Europe): -

20 Fison Way  
Thetford  
IP24 1HJ  
email: [mtcehr@multimatic.com](mailto:mtcehr@multimatic.com)

For Multimatic Marketing & Service Center GmbH:-

Amsterdamerstrasse 192  
50735 Köln  
email: [HR\\_MPSC@multimatic.com](mailto:HR_MPSC@multimatic.com)

For Multimatic Engineering Prague s.r.o.:-

Šafránkova 1243/3  
Stodůlky, 155 00 Prague 5  
Czech Republic  
email: [HR\\_MEP@multimatic.com](mailto:HR_MEP@multimatic.com)

If you have any questions or concerns about how your personal data is being used by the Multimatic Corporate Office in Canada, please contact [HR@multimatic.com](mailto:HR@multimatic.com).

If you feel that your personal data has been processed in a way that does not meet the standard of the GDPR, you have a specific right to lodge a complaint with the relevant supervisory authority. The contact details for the list of supervisory authorities can be found at: [http://ec.europa.eu/justice/article-29/structure/data-protection-authorities/index\\_en.htm](http://ec.europa.eu/justice/article-29/structure/data-protection-authorities/index_en.htm). The supervisory authority will then report to you on the progress and outcome of your complaint.