

PRIVACY POLICY

CASTRUM CANDIDATE PRIVACY POLICY

DATE: Friday, 25 May 2018



CONTENTS

BACKGROUND	1
1. Definitions and Interpretation	1
2. Information About Us	1
3. What Does This Policy Cover?	2
4. What is Personal Data?	2
5. What Are My Rights?	2
6. What Data Do We Collect?	3
7. How Do You Use My Personal Data?	4
8. How Long Will You Keep My Personal Data?	4
9. How and Where Do You Store My Personal Data?	4
10. Do You Share My Personal Data?	5
11. How Can I Control My Personal Data?	5
12. Can I Withhold Information?	5
13. How Can I Access My Personal Data?	5
14. How Do You Use Cookies?	6
15. How Do I Contact You?	7
16. Changes to this Privacy Policy	7



CANDIDATE PRIVACY POLICY

Date: Friday, 25 May 2018



BACKGROUND

Castrum understands that your privacy is important to you and that you care about how your personal data is used. We respect and value the privacy of everyone who visits this website, <http://www.castrum.co.uk/about-us/> and will only collect and use personal data in ways that are described here, and in a way that is consistent with our obligations and your rights under the law.

Please read this Privacy Policy carefully and ensure that you understand it. Your acceptance of this Privacy Policy is deemed to occur upon your first use of Our Site. If you do not accept and agree with this Privacy Policy, you must stop using Our Site immediately.

1. DEFINITIONS AND INTERPRETATION

In this Policy the following terms shall have the following meanings:

“Candidate” means a candidate applying for a role with Castrum.

2. INFORMATION ABOUT US

Our Site is owned and operated by Castrum Limited, a Limited Company registered in England & Wales under company number 04092694.

Registered address: 37 Commercial Road, Poole, Dorset, BH14 0HL

VAT number: 763 9012 26

Data Protection Officer: Jeremy Gill

- Email address: compliance@castrum.co.uk
- Telephone number: 01202 308000
- Postal address: Unit 3 New Fields Business Park, Stinsford Road, Poole, BH17 0NF

Castrum may update this policy from time to time by updating this page. You should check this page from time to time to ensure that you are happy with any changes.

This policy is effective from (25th May 2018).



CANDIDATE PRIVACY POLICY

Date: Friday, 25 May 2018



3. WHAT DOES THIS POLICY COVER?

This Privacy Policy sets out how we use and protect information that you provide Castrum with within the recruitment process.

As part of our recruitment process, we collect, process and store personal information about you. We process this information for a range of purposes relating to the recruitment process and this may include your application, assessment, pre-employment screening and your work permissions. This document sets out:

- Why we collect your personal information;
- What information is collected and;
- How it is processed within the recruitment process.

Throughout this Privacy Policy we use the term “processing” to cover all activities involving your personal data, including collecting, handling, storing, sharing, accessing, using, transferring and disposing of the information.

4. WHAT IS PERSONAL DATA?

Personal data is defined by the General Data Protection Regulation (EU Regulation 2016/679) (the “GDPR”) as ‘any information relating to an identifiable person who can be directly or indirectly identified in particular by reference to an identifier’.

Personal data is, in simpler terms, any information about you that enables you to be identified. Personal data covers obvious information such as your name and contact details, but it also covers less obvious information such as identification numbers, electronic location data, and other online identifiers.

5. WHAT ARE MY RIGHTS?

Under the GDPR, you have the following rights, which we will always work to uphold:

- a. The right to be informed about our collection and use of your personal data. This Privacy Policy should tell you everything you need to know, but you can always contact us to find out more or to ask any questions using the details in Part 15.
- b. The right to access the personal data we hold about you. Part 13 will tell you how to do this.
- c. The right to have your personal data rectified if any of your personal data held by us is inaccurate or incomplete. Please contact us using the details in Part 15 to find out more.
- d. The right to be forgotten, i.e. the right to ask us to delete or otherwise dispose of any of your personal data that we have. Please contact us using the details in Part 15 to find out more.
- e. The right to restrict (i.e. prevent) the processing of your personal data.
- f. The right to object to us using your personal data for a particular purpose or purposes.
- g. The right to data portability. This means that, if you have provided personal data to us directly, we are using it with your consent or for the performance of a contract, and that data is processed using



CANDIDATE PRIVACY POLICY

Date: Friday, 25 May 2018



automated means, you can ask us for a copy of that personal data to re-use with another service or business in many cases.

- h. Rights relating to automated decision-making and profiling. We do not use your personal data in this way.

For more information about our use of your personal data or exercising your rights as outlined above, please contact us using the details provided in Part 15.

Further information about your rights can also be obtained from the Information Commissioner's Office or your local Citizens Advice Bureau.

If you have any cause for complaint about our use of your personal data, you have the right to lodge a complaint with the Information Commissioner's Office.

6. WHAT DATA DO WE COLLECT?

In order to manage your application, we need to process certain personal information about you. The purposes for processing are set out below. We only process your information as necessary for the purposes of progressing your application or as required by law or regulatory requirements, so not all of the purposes set out in the list below will apply to you all of the time.

- Application: CV, name, address, employment history, academic and professional qualifications, date of birth, diversity such as gender, ethnicity, disability, nationality and sexual orientation.
- Assessment: CV, psychometric tests (such as a personality test), interview (face to face, telephone or video conference), behavioural assessments (such as a role play, group exercise or presentation) and technical assessments.
- Pre-employment screening

Below are some examples of the type of personal information Castrum may process.

- Personal details such as name, address, date and place of birth;
- Employment history/employment data; previous employers, positions, dates held, etc.
- Basic salary, benefits, bonuses, etc.
- Education and work history including professional qualifications and skills;
- Employer feedback/references to include regulated references where necessary;
- Nationality/visa/right to work permit information; (e.g. passport, driving licence, National Insurance numbers)
- Results of pre-employment screening checks (e.g. credit history, criminal records check where permitted under law)
- Assessment results e.g. Psychometric assessment results, results from written, video or telephone assessments.

During the process, we may also capture some sensitive personal data about you, for example disability information. We require this information to make reasonable adjustments to enable candidates to apply for



CANDIDATE PRIVACY POLICY

Date: Friday, 25 May 2018



jobs with us, be able to take any online/telephone assessments to attend interviews or assessments with Castrum. This information is also used to prepare for starting with the business and to ensure we comply with regulatory and legal obligations placed on us with regard to recruitment.

As part of the selection process, Castrum performs a number of screening checks, where permitted by local law. These checks are only performed on candidates who have been selected for a role. Your consent will be requested before screening checks are performed.

7. HOW DO YOU USE MY PERSONAL DATA?

Under the GDPR, we must always have a lawful basis for using personal data. Castrum will need to share your personal information internally as part of our recruitment process with employees in HR or managerial positions with responsibility for you or are acting on their behalf.

The recruitment process will involve:

- Assessing and progressing your application
- Assessing your suitability (skills, strengths, behaviours for the role)
- Activities needed to complete the on-boarding and screening process should your application be successful.

To enable these processes your personal information may be shared internally, but the information shared is limited to what is required by each individual to perform their role in the recruitment process.

8. HOW LONG WILL YOU KEEP MY PERSONAL DATA?

We will not keep your personal data for any longer than is necessary in light of the reason(s) for which it was first collected.

9. HOW AND WHERE DO YOU STORE MY PERSONAL DATA?

We will only store your personal data within the European Economic Area (the “EEA”). The EEA consists of all EU member states, plus Norway, Iceland, and Liechtenstein. This means that your personal data will be fully protected under the GDPR or to equivalent standards by law.

The security of your personal data is essential to us, and to protect your data, we take a number of important measures, including the following:

- Suitable physical, electronic and managerial procedures to safeguard your personal information.



CANDIDATE PRIVACY POLICY

Date: Friday, 25 May 2018



10. DO YOU SHARE MY PERSONAL DATA?

We may also need to share your information with certain external third parties including:

- Companies who provide candidate interview and assessment services to Castrum;
- Other third-party suppliers (or potential suppliers) such as HR advisors, who provide services on our behalf.

11. HOW CAN I CONTROL MY PERSONAL DATA?

In addition to your rights under the GDPR, set out in Part 5, when you submit personal data via our careers page, you may be given options to restrict our use of your personal data. In particular, we aim to give you strong controls on our use of your data for direct marketing purposes (including the ability to opt-out of receiving emails from us which you may do by unsubscribing using the links provided in our emails).

12. CAN I WITHHOLD INFORMATION?

You may access our careers page without providing any personal data at all. However, to use all features and functions available on our careers page you may be required to submit or allow for the collection of certain data.

You may restrict our use of Cookies. For more information, see Part 14.

13. HOW CAN I ACCESS MY PERSONAL DATA?

If you want to know what personal data we have about you, you can ask us for details of that personal data and for a copy of it (where any such personal data is held). This is known as a “subject access request”.

All subject access requests should be made in writing and sent to the email or postal addresses shown in Part 15. To make this as easy as possible for you, a Subject Access Request Form is available for you to use. You do not have to use this form, but it is the easiest way to tell us everything we need to know to respond to your request as quickly as possible.

There may be a reasonable fee charged to cover our administrative costs in responding.

We will respond to your subject access request within 30 days of receiving it. Normally, we aim to provide a complete response, including a copy of your personal data within that time. In some cases, however, particularly if your request is more complex, more time may be required up to a maximum of three months from the date we receive your request. You will be kept fully informed of our progress.



CANDIDATE PRIVACY POLICY

Date: Friday, 25 May 2018



14. HOW DO YOU USE COOKIES?

Our Site may place and access certain first-party Cookies on your computer or device. First-party Cookies are those placed directly by us and are used only by us. We use Cookies to facilitate and improve your experience of Our Site and to provide and improve our products and services. We have carefully chosen these Cookies and have taken steps to ensure that your privacy and personal data is protected and respected at all times.

All Cookies used by and on Our Site are used in accordance with current Cookie Law.

Before Cookies are placed on your computer or device, you will be shown a pop-up requesting your consent to set those Cookies. By giving your consent to the placing of Cookies you are enabling us to provide the best possible experience and service to you. You may, if you wish, deny consent to the placing of Cookies; however certain features of Our Site may not function fully or as intended.

Certain features of Our Site depend on Cookies to function. Cookie Law deems these Cookies to be “strictly necessary”. These Cookies are shown in the table below. Your consent will not be sought to place these Cookies, but it is still important that you are aware of them. You may still block these Cookies by changing your internet browser’s settings as detailed below, but please be aware that Our Site may not work properly if you do so. We have taken great care to ensure that your privacy is not at risk by allowing them.

Our Site uses analytics services provided by Google Analytics, Gator Leads and Act-On. Website analytics refers to a set of tools used to collect and analyse anonymous usage information, enabling us to better understand how Our Site is used. This, in turn, enables us to improve Our Site and the products and services offered through it.

The analytics services used by Our Site uses Cookies to gather the required information. You do not have to allow us to use these Cookies, however whilst our use of them does not pose any risk to your privacy or your safe use of Our Site, it does enable us to continually improve Our Site, making it a better and more useful experience for you.

In addition to the controls that we provide, you can choose to enable or disable Cookies in your internet browser. Most internet browsers also enable you to choose whether you wish to disable all Cookies or only third-party Cookies. By default, most internet browsers accept Cookies, but this can be changed. For further details, please consult the help menu in your internet browser or the documentation that came with your device.

You can choose to delete Cookies on your computer or device at any time, however you may lose any information that enables you to access Our Site more quickly and efficiently including, but not limited to, login and personalisation settings.

It is recommended that you keep your internet browser and operating system up-to-date and that you consult the help and guidance provided by the developer of your internet browser and manufacturer of your computer or device if you are unsure about adjusting your privacy settings.



CANDIDATE PRIVACY POLICY

Date: Friday, 25 May 2018



15. HOW DO I CONTACT YOU?

To contact us about anything to do with your personal data and data protection, including to make a subject access request, please use the following details (for the attention of Jeremy Gill):

- Email address: compliance@castrum.co.uk
- Telephone number: 01202 308000
- Postal address: Unit 3 New Fields Business Park, Stinsford Road, Poole, BH17 0NF

16. CHANGES TO THIS PRIVACY POLICY

We may change this Privacy Notice from time to time. This may be necessary, for example, if the law changes, or if we change our business in a way that affects personal data protection.

Any changes will be immediately posted on our careers page and you will be deemed to have accepted the terms of the Privacy Policy on your first use of careers page following the alterations. We recommend that you check this page regularly to keep up-to-date.

