

## **GDPR PROCESSING NOTICE FOR SCOTTISH LEATHER GROUP OPERATIONS LIMITED CANDIDATES**

Scottish Leather Group Operations Limited is a 'data controller'. This means that we are responsible for deciding how we hold and use personal information about you. You are being sent a copy of this notice because you are applying for work with us (whether as an employee, worker or contractor). This notice makes you aware of how and why we use such information. We are required under the General Data Protection Regulation (GDPR) to notify you of the information contained in this privacy notice.

### **The kind of information we hold about you**

We may (as applicable) collect, store and use the following categories of personal information about you:

- The information provided in your application
- The information you have provided in your CV and any covering letter
- Any information you provide us during an interview
- Any information from pre-employment profiling reports you complete
- Any information provided to us during onboarding

We may also collect, store and use the following "special categories" of more sensitive personal information:

- Information about your race or ethnicity or sexual orientation
- Information about your health, including any medical condition, disability status, health and sickness records

### **How is your personal information collected?**

We collect personal information about candidates from the following sources:

- You, the candidate.
- Recruitment agencies and recruitment service providers we engage from which we collect personal contact details, education and career details and other information contained in your CV, covering letter or application.
- Your named referees, from whom we collect information about your experience and suitability for the role.
- Information you provide on LinkedIn and other publicly accessible social media sites and sources.
- Pre-employment profiling reporting companies from whom we collect reports based on your input during such questionnaire process.

### **How we will use personal information**

We will use the personal information we collect about you to:

- Assess your skills, qualifications, and suitability for the role
- Determine whether to shortlist you for the role
- Determine whether to offer you an interview or offer you the role
- Verify your name, address and other personal information provided
- Carry out reference checks, and pre-employment checks where applicable
- Communicate with you about the recruitment process and any offer of work (if applicable)
- Keep records related to our hiring processes
- Comply with legal or regulatory requirements

It is in our legitimate interests to decide whether to appoint you to the role since it would be beneficial to our business to appoint someone to that role. We also need to process your personal information to decide whether to enter into a contract with you.

If you fail to provide information when requested, which is necessary for us to consider your application (such as evidence of qualifications or work history), we may not be able to process your application successfully.

We will use your particularly sensitive personal information in the following ways:

- We will use information about your disability status to consider whether we need to provide appropriate adjustments during the recruitment process, for example whether adjustments need to be made during a test, interview or visit to one of our sites.
- We will use information about your race or national or ethnic origin, or sexual orientation, to ensure meaningful equal opportunity monitoring and reporting.

We have in place an appropriate policy document and safeguards which we are required by law to maintain when processing such data.

### **Information about criminal convictions**

We do not envisage that we will process information about criminal convictions.

### **Automated decision making**

You will not be subject to decisions that will have a significant impact on you based solely on automated decision-making.

### **Who might you share my information with?**

We will only share your personal information with other entities within the Scottish Leather Group Operations Limited or service providers who undertake services throughout the recruitment process as outlined in this notice, on our behalf.

We share your information with a service provider who undertakes pre-employment health screening. We do not receive any detailed information about your health from that service provider as part of that process however they notify us where they consider reasonable

adjustments may be necessary, which we will then discuss with you. Where we require further pre-employment medical examination, we will discuss this with you.

### **How secure is my information?**

Our third-party service providers are required to take appropriate measures to protect your personal information. We do not allow 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 and in accordance with our instructions and subject to a duty of confidentiality.

Scottish Leather Group (and associated entities) has also put in place appropriate measures to protect the security of your information and staff are subject to a duty of confidentiality.

### **How long will you use my information for?**

We will only retain your personal information for as long as necessary to fulfil the purposes we collected it for, including satisfying any legal, accounting or reporting requirements.

Where you are not offered an interview or are not engaged by Scottish Leather Group (or associated entities) we will retain your personal information in accordance with our data retention and deletion policy.

In some circumstances we may anonymise your personal information so that it can no longer be associated with you, in which case we can use it without further notice to you.

### **Your rights in connection with personal information**

Under certain circumstances, by law you have the right to:

- Request access to your personal information (commonly known as a "data subject access request"). This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it.
- Request correction of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.
- Request erasure of your personal information. This enables you to ask us to delete or remove personal information where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal information where you have exercised your right to object to processing (see below).
- Object to processing of your personal information where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground. You also have the right to object where we are processing your personal information for direct marketing purposes.
- Request the restriction of processing of your personal information. This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it.
- Request the transfer of your personal information to another party.

If you want to review, verify, correct or request erasure of your personal information, object to the processing of your personal data, or request that we transfer a copy of your personal information to another party, please contact our HR Team ([hr@scottishleathergroup.com](mailto:hr@scottishleathergroup.com)) in writing.

### **Data Protection Officers and Contacts**

Scottish Leather Group Limited:

Lesley Chalk ([lesley.chalk@scottishleathergroup.com](mailto:lesley.chalk@scottishleathergroup.com))

Scottish Leather Group Operations Limited:

Graham Andrew ([graham.andrew@scottishleathergroup.com](mailto:graham.andrew@scottishleathergroup.com))

If you have any questions about this privacy notice or how we handle your personal information, please contact Scottish Leather Group's Head of HR in the first instance (email: [hr@scottishleathergroup.com](mailto:hr@scottishleathergroup.com))

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues.