

Privacy Notice for Job Applicant

Introduction

Steer Automotive Group Ltd are committed to protecting your personal data. This privacy notice explains the types of data we collect from you, how we use it, who we share it with, how long we retain your data, your rights as a data subject, how you can manage the information we hold on you and how you can contact us.

We will only process your personal data for contractual, legitimate or legal reasons and for reasons in your vital interest. If we require consent to process your personal data it will be freely given and you will be able to withdraw your consent at any time. We will always give you the option to receive marketing from us.

We do not sell your information. We do share your personal data with our trusted third parties companies and if we are required to for legal reasons.

We may collect personal information from you directly or we may be passed your information from a third parties such as recruitment partners or previous employees for references. We will only collect information that is necessary for employment.

This privacy notice is subject to change and we advise you to check every so often. Where possible we will contact you directly to inform you of any changes.

Data we collect

We will collect the personal information referred to below for the purposes stated. We may use it for other purposes in the future if reasonable to do so and will tell you in advance. We may from time to time require other information, in which case we will tell you why before we collect it.

Types of personal data:

- First name
- Family name
- Other names
- Date of birth
- Age
- Place of birth
- Nationality
- Gender
- Marital status
- Educational details and qualifications including titles (e.g. Phd, Dr.)
- Content of CV and covering letter
- Previous salary information (e.g. Wage slips, P45 and P60)
- References
- Home address (street, city, Post Code, country)
- Telephone number(s) (home phone, cell phone)
- Personal email address (es), twitter name, etc
- National Insurance number
- Right to work documentation
- Health data

- Criminal and administrative offence convictions

Driving Licence:

- Driving licence number
- Driving licence expiry date
- Date of birth

Telephone Recordings

We may record any telephone calls

CCTV

We record CCTV footage at all our repair sites for the purposes stated.

Third Party Personal Data

We will collect any data you provide us.

If you decide to provide another person's details, you confirm that those persons are aware that you have provided their data to Steer Automotive Group and furthermore that they consent to Steer Automotive Group and/or relevant company storing, transferring (where necessary) and using their data for the purposes for which you provided such data.

When data is collected

Data will be collected:

- At the time of recruitment

We will collect personal information from you directly or we will be passed your information from a third party such as recruitment partners or previous employees for references. We will only collect information that is necessary for employment.

If you are successful in your job application we will collect further information which is described in our employee privacy notice.

How your data is used

We process personal data on prospective employees in order to carry out an effective and efficient recruitment processes.

We will only process your data for the reason it was collected. These will be for the performance of a contract, legitimate reasons, legal reasons or for your vital interests. If we require consent to processes your personal data it will be freely given and you will be able to withdraw your consent at any time.

- **Legal obligation**

We process your personal data to ensure our compliance with legal obligations:

- Carrying out checks in relation to your right to work in the UK
- Making reasonable adjustments for disabled employees

- **Legitimate reasons**

As a business we have legitimate interests to process your personal data:

- Making recruitment decisions in relation to both initial and subsequent employment e.g. promotion
- Making decisions about salary and other benefits to provide to you
- Assessing training needs
- Dealing with legal claims made against us
- Preventing fraud
- Recruitment process

CCTV

We use CCTV at all our repair sites for the following reasons:

- Prevention or detection of crime disorder
- Apprehension and prosecution of offenders
- Interest of public and employee Health and Safety
- Protection of our property, assets and employees
- For disciplinary purposes

All cameras are located in prominent positions within staff view.

Signs are placed at all entrance points to premises and throughout the site to ensure staff are aware they are entering an area that is covered by CCTV surveillance equipment. The signs include details on the purpose, our name and contact details.

We do not and do not have the facility to use automatic facial recognition.

Call Recording

We may record any telephone calls:

- To ensure our customer services are met
- For training purposes

Transfer and Use groupwide

As a member of a group of companies, your Personal Information will be used within the group of companies listed below and all of its parent and affiliated group entities (“Group”) for the Purposes.

- Any Branch falling into the Steer Automotive Group
- Any Branch falling into the Quicks ASR Group

Special Categories of Personal Data

- Health Data

We may use your health data to make appropriate adjustments to your place of work as far as is reasonable to do so.

Data on disabilities is also collected and processed for the purpose of proper social selection and compliance with statutory requirements regarding employees with a disability.

Data on other Physical, mental health or condition is collected in the hiring process to comply with obligations regarding precautionary measures for employees and to administer the normal employment relationship

We will process special category data:

- For the purposes of equal opportunities monitoring
- To determine reasonable adjustments for your place of work
- For preventative or occupational medicine

- For assessment of your working capacity

Criminal Convictions

We will only collect criminal conviction data where it is appropriate given the nature of your role and where the law permits us. This data will usually be collected at the recruitment stage, however, may also be collected during your employment. We use criminal conviction data to determine your suitability for the role.

We rely on the lawful basis of legitimate interest to assess your suitability for the employment role to process this data.

Lawful basis for processing: Contractual performance

We will use your personal data in order to perform a contract with you.

Legitimate Interest

We may use your personal data for our legitimate interests except where such interests are overridden by the data subject.

Legal reasons

We may use your personal information in order to fulfil our legal obligations

Vital interest

We may use your personal information if there is urgent safety concerns relating to yourself

Consent

We may process your personal data if you have given us consent to do so.

Who your personal information is shared with

We will not sell your personal data and we will only share your personal data with our trusted third party companies.

We only share personal information on a need to know basis.

Employees within the company who have responsibility for recruitment will have access to your data which is relevant to their function.

The Company may transfer your Personal Information to employees, advisors, business partners, and to any member of the Group, with an adequate level of data protection and with a need-to-know for the Purposes (each called "Third Parties").

We may also share your data as part of a company sale or restructure, or for other reasons to comply with legal obligations upon us. We have data processing agreements in place with such third parties to ensure data is not compromised. Third parties must implement appropriate technical and organisational measures to ensure the security of your data.

- Line managers and superior managers across the Group (such as matrix managers in other companies or businesses in the Group)
- Legal and other professional advisers.
- HR personnel wherever located in the Group or outside
- Human Resources administrative support

- Local and central government and similar bodies or agencies when required by law or court order
- Compliance with Government agencies including HMRC, The Pensions Regulator
- Our professional advisors
- Auditors
- Our trusted third party companies

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Sending Data Abroad

We may send you personal data within the EEA and we will follow the guidelines.

If it is necessary to send personal data outside the EEA we will adhere to the guidelines.

How long your personal data is kept

We will only hold your personal data for as long as necessary. For unsuccessful candidates we retain your information for 6 months to a year.

If your application is not successful and you have not provided consent for us to keep your data for the purposes of future suitable job vacancies, we will keep your data for 6 months once the recruitment process has ended.

If you have provided consent for us to keep your data for future job vacancies we will keep your data for 12 months once the recruitment exercise has ended.

Should you be successful in your job application, we will gather further information from you. This is outlined in our Employee Privacy Notice.

Employee Personal Information and other personal data will be retained for the duration of the employment and afterwards. It will be used after the end of the employment relationship in order to meet any actual or potential legal obligations, defend or bring claims, answer tax requests, continue to provide benefits (e.g., long term sickness or pension payments) and otherwise for lawful business purposes.

To the extent employee personal information or other personal data is not required it will be deleted, destroyed or otherwise neutralised in accordance with Company policy on document retention from time to time.

Personal data security

Steer Automotive Group take the security of your personal data very seriously.

We have put in place procedures and other appropriate security to protect the personal information you share with us. We destroy it using secure or certified methods of destruction when no longer needed.

Where relevant we will anonymise your personal data.

We have a data processing agreement in place with third parties to ensure data is not compromised. Third parties must implement appropriate technical and organisational measures to ensure the security of your data.

How you can manage your personal data

As an individual you have the right to access your data and correct or delete the personal data we hold on you. You have the right to withdraw consent you have given.

You have a number rights as an individual under the GDPR that are listed below. If you would like to exercise your rights we will require proof of identity and will respond within 30 days after receiving the request.

Your rights

- To be informed
 - You have the right to be informed how your personal data will be used
- To access
 - You may request a copy of the personal data we hold on you
- To rectification
 - You have the right to rectify any personal data that is inaccurate or incomplete
- To erasure
 - You have the right for your personal data to be deleted and to be forgotten by us
- To restrict processing
 - You have the right to restrict the personal data we process
- To data portability
 - You have the right to request the transfer of your personal information in a structured format
- To object
 - You have the right to object to the use of your personal data
- The right(s) in relation to automated decision making and profiling
 - We do not use automated decision making or profiling when processing your personal data
- Consent
 - You may withdraw consent when we rely on it.

If you wish to exercise the above rights, manage or update your information, you can do so by contacting us using the details below:

Email: DataProtection@steer.co.uk

Post: Steer Automotive Group Ltd, 13 March Place, Gatehouse Way, Aylesbury, Buckinghamshire, HP19 8UG.

If you are unhappy, you have the right to lodge a complaint with the supervisory authority in your EU state, your place of work or at the place of the alleged infringement.

You can contact the Information Commissioners Office, the supervisory authority in the UK, at the address below:

Address: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF

Email: casework@ico.org.uk

Telephone: 0303 123 1113

Changes to this Policy

This Policy was last updated on 20/05/2019

This privacy notice is subject to change and we advise you to check every so often. Where possible we will contact you directly to inform you of any changes.