

UK, GDPR Privacy notice for Talent Acquisition

Integreon Managed Solutions Limited (**Integreon**) is committed to protecting the privacy and security of your personal information. This privacy notice describes how we collect and use personal information about you during the Integreon Talent Acquisition (recruiting) process, in accordance with the General Data Protection Regulation (GDPR). Integreon is a "data controller". This means that we are responsible for deciding how we hold and use personal information about you. We are required under data protection legislation to notify you of the information contained in this privacy notice.

1. Applicability

This notice applies to the Talent Acquisition process. 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 information about you, so that you are aware of how and why we are using such information and what your rights are under the data protection legislation.

2. The kind of information we hold about you

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data). On rare occasions, there may be "special categories" of more sensitive personal data, which require a higher level of protection.

We will collect, store, and use the following categories of personal information about you:

- Personal contact details such as name, title, addresses, telephone numbers, and personal email addresses.
- Recruitment information (including copies of right to work documentation, references and other information included in a CV or cover letter or as part of the application process).
- Employment records (including job titles, work history, and professional memberships).
- Any other work related information you provide, for example, education or training certificates.

2.1. How is your personal information collected?

We collect personal information about applicants, through the application and talent acquisition process, either directly from candidates or sometimes from an employment agency or background check provider. We may sometimes collect additional information from third parties including former employers, personal referees, credit reference agencies or other background check agencies.

3. How we will use information about you

We will only use your personal information when the law allows us to. Most commonly, we will use your personal information in the following circumstances:

1. Where we need to comply with a legal obligation.
2. Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.

We may also use your personal information in the following situations, which are likely to be rare:

1. Where we need to protect your interests (or someone else's interests).
2. Where it is needed in the public interest or for official purposes.

3.1. Situations in which we will use your personal information

We need all the categories of information in the list above (see Section 3) primarily to allow us to perform our contract with you and to enable us to comply with legal obligations. In some cases, we may use your personal information to pursue legitimate interests of our own or those of third parties, provided your interests and fundamental rights do not override those interests. The situations in which we will process your personal information are listed below:

Situation	Performanc e of Contract	Legal obligation s	Integreon's legitimate Interests
1. Checking you are legally entitled to work in the UK.	X	X	X
2. Complying with health and safety obligations.		X	
3. Equal opportunities monitoring.		X	X
4. Making a decision about your recruitment.			X

Some of the above grounds for processing will overlap and there may be several grounds, which justify our use of your personal information.

3.2. If you fail to provide personal information

If you fail to provide certain information when requested, we may be prevented from complying with our legal obligations (such as checking you are legally entitled to work in the UK).

3.3. Change of purpose

We will only use your personal information for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If we need to use your personal information for an unrelated purpose, we will notify you and we will explain the legal basis, which allows us to do so.

Please note that we may process your personal information without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

4. Automated decision-making

Automated decision-making takes place when an electronic system uses personal information to make a decision without human intervention. We are allowed to use automated decision-making in the following circumstances:

1. Where we have notified you of the decision and given you 21 days to request a reconsideration.
2. Where it is necessary to perform the contract with you and appropriate measures are in place to safeguard your rights.
3. In limited circumstances, with your explicit written consent and where appropriate measures are in place to safeguard your rights.

If we make an automated decision on the basis of any particularly sensitive personal information, we must have either your explicit written consent or it must be justified in the public interest, and we must also put in place appropriate measures to safeguard your rights.

You will not be subject to decisions that will have a significant impact on you based solely on automated decision-making, unless we have a lawful basis for doing so and we have notified you.

We do not envisage that any decisions will be taken about you using automated means, however we will notify you in writing if this position changes.

5. Data sharing

We may have to share your data with third parties, including third-party service providers and other entities in the group. We require third parties to respect the security of your data and to treat it in accordance with the law. We may transfer your personal information outside the EU. If we do, you can expect a similar degree of protection in respect of your personal information.

5.1. Why might you share my personal information with third parties?

We will share your personal information with third parties where required by law, where it is necessary to administer the working relationship with you or where we have another legitimate interest in doing so.

5.2. Which third-party service providers process my personal information?

"Third parties" includes third-party service providers (including contractors and designated agents) and other entities within our group.

We will share personal data regarding your participation in any pension arrangement operated by a group company with the scheme managers of the arrangement in connection with the administration of the arrangements.

5.3. How secure is my information with third-party service providers and other entities in our group?

All our third-party service providers and other entities in the group are required to take appropriate security measures to protect your personal information in line with our policies. 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.

5.4. When might you share my personal information with other entities in the group? (amend)

We will share your personal information with other entities in our group as part of our Talent Acquisition processes. In particular, we will share information with Integreon Managed Solutions (India) Private Ltd. in India which processes Talent Acquisition information on behalf of Integreon Managed Solutions Ltd. We will also share data with Integreon Inc. which is a US company, and with Integreon Managed Solutions Philippines, Inc. which is a Philippines company. Sharing information with Integreon Inc. is mainly for business planning purposes and management reporting purposes, as it is the parent company of the UK entity and sharing information with Integreon Managed Solutions Philippines, Inc. is mainly for management reporting purposes.

5.5. Transferring information outside the EU

We will transfer the personal information we collect about you to the following countries outside the EU: the United States of America, the Philippines and India in order to manage your Talent Acquisition information.

US Transfers

There is an adequacy decision by the European Commission in respect of the United States of America (for companies who have signed up to something called the Privacy Shield Network). Integreon Inc. has signed up to this Privacy Shield. More information is here: <https://www.privacyshield.gov/welcome>. The Privacy Shield is a set of requirements governing the use and treatment of personal data received from the EU. Participants agree to comply with these requirements. This means that transfers of your data to Integreon Inc. in the United States is deemed to provide an adequate level of protection for your personal information.

Transfers to the Philippines

To ensure that your personal information does receive an adequate level of protection, when it is transferred to the Philippines, we have put in place the following appropriate measure, to ensure that your personal information is treated by Integreon Managed Solutions Philippines, Inc. in a way that is consistent with and which respects the EU and UK laws on data protection. Integreon Managed Solutions Philippines, Inc. has an agreement in place with the Company, which set out certain protections in relation to personal data.

Transfers to India

To ensure that your personal information does receive an adequate level of protection, when it is transferred to India, we have put in place the following appropriate measure, to ensure that your personal information is treated by Integreon Managed Solutions (India) Private Ltd. in a way that is consistent with and which respects the EU and UK laws on data protection. Integreon Managed Solutions (India) Private Ltd. has an agreement in place with the Company, which set out certain protections in relation to personal data. If you require further information about these protective measures, you can request them from HRUK@Integreon.com

6. Data security

We have put in place measures to protect the security of your information. Details of these measures are available upon request.

Third parties will only process your personal information on our instructions and where they have agreed to treat the information confidentially and to keep it secure. We have put in place appropriate security measures to prevent your personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal information to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal information on our instructions and they are subject to a duty of confidentiality.

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

7. Data retention

7.1. 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 for the purposes of satisfying any legal or reporting requirements. We may continue to retain and use your personal data for one year after you have applied to us, unless you decide to opt-out prior to such time. After one year, unless we hear from you, your data will be deleted.

8. Rights of access, correction, erasure, and restriction

8.1. Your duty to inform us of changes

It is important that the personal information we hold about you is accurate and current. Please keep us informed if your personal information changes during your working relationship with us.

8.2. Your rights in connection with personal information

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

1. **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.
2. **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.
3. **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).
4. **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.

5. **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.

6. **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 HRUK@Integreon.com in writing.

8.3. What we may need from you

We may need to request specific information from you to help us confirm your identity and ensure your right to access the information (or to exercise any of your other rights). This is another appropriate security measure to ensure that personal information is not disclosed to any person who has no right to receive it.

9. Right to withdraw consent

In the limited circumstances where you may have provided your consent to the collection, processing and transfer of your personal information for a specific purpose, you have the right to withdraw your consent for that specific processing at any time. To withdraw your consent, please contact HRUK@Integreon.com. Once we have received notification that you have withdrawn your consent, we will no longer process your information for the purpose or purposes you originally agreed to, unless we have another legitimate basis for doing so in law.

10. Changes to this privacy notice

We reserve the right to update this privacy notice at any time, and we will provide you with a new privacy notice when we make any substantial updates. We may also notify you in other ways from time to time about the processing of your personal information.