

INTRODUCTION

Ebeni (ICO Registration Z2038288) takes your privacy very seriously, and is the data controller for the information you provide during the recruitment process unless otherwise stated.

Our personal information handling policy and procedures have been developed in line with the requirements of the 1995 European Union Data Protective Directive (Directive 95/46/EC) and the General Data Protection Regulation (in force from 25th May 2018) and applicable national law. If you have any queries about how we handle your information please contact us at privacy@ebeni.com.

WHAT INFORMATION DO WE ASK FOR, AND WHY?

Ebeni do not collect more information than we need to fulfil our stated purposes and will not retain it for longer than is necessary.

The information we ask for is used to assess your suitability for employment. You do not have to provide what we ask for but it might affect your application if you do not.

If we make an offer of employment we will ask you for information so that we can carry out pre-employment checks. We are required to confirm the identity of our employees, their right to work in the United Kingdom and seek assurance as to their trustworthiness, integrity and reliability.

In addition, some roles require a higher level of security clearance – this will be made clear on the job advert. If this is the case, then once you start with Ebeni, you will be asked to submit information via the National Security Vetting process to UKSV (United Kingdom Security & Vetting Service). UKSV will be the data controller for this information.

UKSV will tell Ebeni whether your application is successful or not. If it is unsuccessful, Ebeni will not be told the reason(s) why but may need to review your suitability for the role or how you perform your duties.

The personal data we process includes:

- Your name, home address, email address and/or phone numbers;
- Your date of birth, marital status, nationality and national insurance number (where you provide this to us);
- Your educational and employment history;
- Other information contained within your CV, application letter or other documents or information you submit to us;
- Information from the selection process, if any;
- References and assessments relating to your work for previous employers;
- Medical and financial information (where you provide this to us);
- Information to confirm your identity and right to work, such as a copy of your passport;
- Details of any unspent convictions;
- With your specific consent, information relating to your ethnicity, gender nationality, disability, religion, sexual orientation and other diversity-related information.



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WHAT IS THE SOURCE OF THIS INFORMATION?

We obtain this information directly from you, our personnel, through our systems and equipment, as well as from third parties such as recruitment agencies, background checking companies or former employers. We may also obtain it from your public profiles available online.

Assessments

Ebeni might ask you to participate in assessment days; complete tests or online occupational personality profile questionnaires; or to attend an interview – or any combination of these.

Information will be generated by you and by Ebeni. For example, you might complete a written or online test or we might take interview notes. This information is held by Ebeni, and in the case of online tests, SHL Online.

SHL Online

SHL provide online testing for us. If we ask you to complete one of these tests, we will send you a link to the test. Your answers will be provided to and held by SHL. Ebeni will be provided with a summary of the results.

Here is a link to their Privacy Notice: <https://www.shl.com/en/privacy/>

HOW DO WE USE THE INFORMATION YOU PROVIDE TO US?

Ebeni will use the contact details you provide to us to contact you to progress your application. We will use the other information you provide to assess your suitability for the role you have applied for, or to fulfil legal or regulatory requirements.

Equal opportunities information

Applicants selected for interview will be asked to provide anonymous equal opportunities information by completing the Equality Monitoring Form. This is not mandatory information, if you do not provide it will not affect your application or interview. The information will not be made to available to other employees including hiring managers in a way which can identify you. Any information you do provide, will be used only to produce and monitor equal opportunities statistics.

DATA SHARING – Why we may share your personal data with others

Ebeni may share your personal data with our professional advisors such as our auditors and external legal and financial advisors, but will not share any of the information you provide with any third parties for marketing purposes.

Personal data may be shared with government authorities and /or law enforcement officials if required by law or if needed for the legal protection of our legitimate interests in compliance with applicable laws. Personal data may also be shared with third party service providers who will process it on behalf of Ebeni for the purposes described above.

HOW LONG WILL WE KEEP THE INFORMATION WHICH YOU PROVIDE TO US?

We will not keep your personal information for longer than is necessary and will only retain the personal information that is necessary to fulfil the purpose for which it was collected. We are

required to retain certain information by law, or if it is reasonably necessary to meet regulatory requirements, resolve disputes, prevent fraud and abuse, or enforce our terms and conditions.

We will keep the personal data connected to your job application (including any interview and assessment records) for 12 months from the date of their creation by Ebeni or receipt from you. If your application is successful and you become an employee, we will provide you with a copy of the Employee Privacy Notice which will refer to retention periods which will apply to your personal data during your employment.

WHERE IS MY DATA STORED, AND HOW SECURE IS IT?

We take the safeguarding of your data very seriously. All personal information you provide will be held securely by us and/or our data processors whether the information is in electronic or physical format. We have put in place appropriate security measures to prevent your personal information from unauthorised access, use or disclosure. None of your personal data will be stored outside of the European Economic area.

Ebeni use Dynamics 365 for Talent to store personnel records of both applicants and employees which is an internally used HR records system.

LEGAL RIGHTS – in relation to your personal information

It is important that the personal information which we hold about you is accurate and current. Please keep us informed if your personal information changes during your relationship with us. You are entitled to:

- Request access to your personal information;
- Request the correction or erasure of your personal information;
- Object to the processing of your personal information;
- Request a restriction of processing of your personal information; and
- Request the transfer of your personal information to you or to a third party.

If you would like to review, verify, correct or request erasure or object to the processing of your personal data or request that we transfer a copy of your personal data to another party, please contact privacy@ebeni.com.

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

HOW DO WE MAKE DECISIONS ABOUT RECRUITMENT?

Final recruitment decisions are made by the Directors. All information gathered during the application process is considered.

If you have any questions about decisions made about your application please speak to your contact within our HR team or by emailing info@ebeni.com.

HOW CAN I FIND OUT MORE ABOUT EBENI'S HANDLING OF MY DATA?

Should you have any queries regarding this Privacy Notice, about our processing of your personal data or wish to exercise your rights you can contact Data Protection Advisor by writing to: The Data Protection Advisor, Ebene Ltd, Hartham Park, Corsham, Wiltshire SN13 0RP, or by email to privacy@ebene.com.

If you are not happy with our response, you can contact the Information Commissioner's Office: <https://ico.org.uk/>.

Date of Last Review: May 2018

Next Review Due: May 2019