

PRIVACY NOTICE FOR JOB APPLICANTS

Wilson Power Solutions is committed to protecting the privacy and security of your personal information.

This privacy notice applies to people who apply for jobs with Wilson Power Solutions and describes how we collect and use personal information about you during the recruitment process and after, in accordance with the General Data Protection Regulation (GDPR).

Wilson Power Solutions 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.

It is important that you read this notice, together with any other privacy notice we may provide when we are collecting or processing personal information about you, so that you are aware of how and why we are using such information.

1. Data Protection Principles

Under GDPR, all personal data obtained and held by us must be processed according to a set of core principles. In accordance with these principles, we will ensure that:

- a) processing is fair, lawful and transparent
- b) data is collected for specific, explicit, and legitimate purposes
- c) data collected is adequate, relevant and limited to what is necessary for the purposes of processing
- d) data is kept accurate and up to date. Data which is found to be inaccurate will be rectified or erased without delay
- e) data is not kept for longer than is necessary for its given purpose
- f) data is processed in a manner that ensures appropriate security of personal data including protection against unauthorised or unlawful processing, accidental loss, destruction or damage by using appropriate technical or organisation

2. Types of Data Held

Personal data, or personal information, means any information about an individual from which that person can be identified.

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.
- Information you provide in CVs such as career history, language, skills and competencies, educational and training information.
- Data generated by interviewers and recruiters, based on their interactions with you.
- Data generated by your participation in any assessments.
- Employment preferences (e.g. desired salary, willingness to relocate).
- Date of birth.

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- Gender.
- Recruitment information (including copies of right to work documentation, references and other information as part of the application process).
- Photographs.

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

- Information about your age, gender, disability race or ethnicity, religious beliefs, sexual orientation, length of service
- Information about your health, including any medical condition.
- Information about criminal convictions and offences.

3. Collecting Your Data

We collect personal information about people applying for jobs through the recruitment process, either directly from candidates, from previous employers and from employment agencies.

4. Lawful Basis for Processing

The law on data protection allows us to process your data for certain reasons only. In the main, we process your data in order to comply with a legal requirement or in order to effectively manage the recruitment process.

The information below categorises the types of data processing, appropriate to your status, we undertake and the lawful basis we rely on.

Recruitment Activity requiring your data	Lawful basis
Assess your suitability for employment for the role for which you are applying, as well as future roles that may become available	Our legitimate interests
Making decisions about salary and other benefits	Our legitimate interests
Perform assessments to validate the adequacy of your profile with the job requirements (e.g. virtual job simulations, skills assessments)	Our legitimate interests
Realise background checks and verification where applicable and as permitted by laws	Our legitimate interests
Manage your application with all stakeholders involved in the process (e.g. talent acquisition teams, HR and recruiting managers...)	Our legitimate interests
When applicable, record on-line interview for sharing with hiring managers	Our legitimate interests
Manage administrative tasks (e.g. for interview related expenses / interviews logistics)	Our legitimate interests
Answer any legal or regulatory obligations or reporting	Legal Obligation
Prepare and sign an offer letter for employment	Our legitimate interests
If you receive and accept an offer of employment with us:	
Pre-Employment Purposes	Our legitimate interests
Notify relevant stakeholders/third parties to prepare for your arrival (e.g. IT assets etc.)	Our legitimate interests
Prepare/finalise your employment contract	Our legitimate interests
Carry out checks in relation to your right to work in the UK	Legal Obligation

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Making reasonable adjustments for disabled employees	Legal Obligation
Plan your induction programme	Our legitimate interests
Complete your personnel file in our human resource system	Our legitimate interests

5. Special Categories of Data

"Special categories" of particularly sensitive personal information require higher levels of protection. We need to have further justification for collecting, storing and using this type of personal information. We may process special categories of personal information in the following circumstances:

1. In limited circumstances, with your explicit written consent.
2. Where we need to carry out our legal obligations and in line with our Confidentiality and Data Protection Policies.
3. Where it is needed in the public interest, such as for equal opportunities monitoring and in line with our Confidentiality and Data Protection Policies.
4. Where it is needed to assess your working capacity on health grounds, subject to appropriate confidentiality safeguards.

Less commonly, we may process this type of information where it is needed in relation to legal claims or where it is needed to protect your interests (or someone else's interests) and you are not capable of giving your consent, or where you have already made the information public. We may also process such information about job applicants in the course of legitimate business activities with the appropriate safeguards.

Our obligations:

- We will use your particularly sensitive personal information in the following ways:
- We will use information about your physical or mental health, or disability status, to ensure to provide appropriate workplace adjustments,
- We will use information about your gender, age, disability or national or ethnic origin, religious, philosophical or moral beliefs, or your sexual orientation, to ensure meaningful equal opportunity and diversity monitoring and reporting.

We do not need your consent if we use special categories of your personal information in accordance with our written policy to carry out our legal obligations or exercise specific rights in the field of employment law.

6. Failure to Provide Data

Your failure to provide us with data may mean that we are unable to fulfil our requirements for the recruitment process entering into a contract of employment with you. This could include being unable to offer you employment, or administer contractual benefits.

7. Criminal Conviction Data

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. We may use criminal conviction data to determine your suitability for the role. We rely on the lawful basis of legitimate interests to process this data.

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8. Who we share your Data with

Employees within our company or other Wilson Power Solutions entities who have responsibility for recruitment will have access to your data which is relevant to their function. All employees with such responsibility have been trained in ensuring data is processing in line with GDPR.

Third parties:

During the recruitment and pre-employment process, data is shared with third parties for the following reasons:

- For the administration of staff benefits
- For the administration of IT
- Sponsorship of employees
- Employment, tax, payroll, and legal advice

9. Protecting your Data

We are aware of the requirement to ensure your data is protected against accidental loss or disclosure, destruction, and abuse. We have implemented processes to guard against such.

10. Retention Periods

We will only retain your personal information for as long as necessary, which will be no longer than one year, unless you are appointed to a post within Wilson, where we will keep this in line with the privacy statement for employees.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

11. Automated Decision Making

Automated decision making means making decision about you using no human involvement e.g. using computerised filtering equipment. No decision will be made about you solely on the basis of automated decision making (where a decision is taken about you using an electronic system without human involvement) which has a significant impact on you.

12. Rights of access, correction, erasure and restriction

You have the following rights in relation to the personal data we hold on you:

- a) the right to be informed about the data we hold on you and what we do with it;
- b) the right of access to the data we hold on you. More information on this can be found in our Data Protection Policy;
- c) the right for any inaccuracies in the data we hold on you, however they come to light, to be corrected. This is also known as 'rectification';
- d) the right to have data deleted in certain circumstances. This is also known as 'erasure';
- e) the right to restrict the processing of the data;

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- f) the right to transfer the data we hold on you to another party. This is also known as 'portability';
- g) the right to object to the inclusion of any information;
- h) the right to regulate any automated decision-making and profiling of personal data.

13. Consent

Where you have provided consent to our use of your data, you also have the right to withdraw that consent at any time. This means that we will stop processing your data.

14. Making a Complaint

If you think your data rights have been breached, you are able to raise a complaint with the Information Commissioner (ICO). You can contact the ICO at Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF or by telephone on 0303 123 1113 (local rate) or 01625 545 745.

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