

Candidate Privacy Notice



Data controller

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I. General provisions

The Candidate Privacy Notice (*hereinafter referred as the "Notice"*) sets forth the purposes and principles of Intersurgical Ltd (*hereinafter referred as "Intersurgical" the "Company"*) candidates' personal data processing, the processed personal data and the terms of their storage, the procedures of implementation of the rights of data subjects, the transfer of personal data to the recipients, data processors.

As part of any recruitment process, Intersurgical collects and processes personal data relating to job applicants.

The Company is committed to being transparent about how it collects and uses that data and to meeting its data protection obligations.

The Notice has been prepared in accordance with the Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (the General Data Protection Regulation) (*hereinafter referred as the "Regulation"*) and other legal acts regulating the protection and processing of the personal data.

II. Definitions

You — a Candidate.

Candidate's consent – any freely given, specific, informed and unambiguous indication of Your wishes by which you, by a statement or by a clear affirmative action, signify agreement to the processing of personal data relating to you. Please be informed that your consent is given by submitting your CV and any other related documents to the particular position.

Legal Obligation — processing your personal data when it is necessary for compliance with a legal or regulatory obligation that we are subject to.

Candidate — a person applying for a job position in the Company.

Group — any subsidiary, parent company or any related company of the Company in United Kingdom or abroad.

III. What information does the company collect?

The Company collects a range of information about you. The following are the main, but not all, categories of personal data processed by the Company.

- **Personal identification data** — name, surname, date of birth (age), gender;
- **Data on qualification and experience** — data on working experience (workplace, working period, duties, responsibilities or achievements), information on your education (institution of education, period, acquired degree or qualification), information on professional development courses (attended courses, obtained certificates), information on foreign language, informational technology, driving skills and other competences, as well as, other information provided by you in curriculum vitae (CV), motivational letter and other documents of the applicant or which we received from the third parties.
- **Contact details** — permanent residence address, correspondence address (if different from the permanent place of residence), telephone, email address
- **Recommendations, employers' feedback** — person recommending or providing feedback about the applicant, his/her contacts, content of the feedback or recommendation;
- **Remuneration data** — information about your current level of remuneration, including benefit entitlements;
- **Other information** — whether or not you have a disability for which the Company needs to make reasonable adjustments during the recruitment process, information about your entitlement to work in the UK and other provided information.

The Company collects this information in a variety of ways. For example, data might be contained in application forms, CVs or resumes or collected through interviews or other forms of assessment, including online assessments. Information about your candidacy, your curriculum vitae (CV) or other application documents can be also obtained from job search, recruitment or intermediary service providers, employment agencies or career portals.

The Company will also collect personal data about you from third parties, such as references supplied by former employers and information from criminal records checks (only in cases when this data is necessary to verify whether the Employee meets the requirements established by legal acts for the performance of duties or performance of work functions). The Company will seek information from third parties only once a job offer to you has been made and will inform you that it is doing so.

We may collect your personal data relating to qualifications, professional abilities and qualities from the former employer after informing you, and from your current employer — only with your consent.

Data will be stored in a range of different places, including on your application record, in HR management systems and on other IT systems (including email).

IV. What are the purposes of processing your personal data, the legal basis and the categories of personal data processed?

Purpose of personal data processing	Legal basis for personal data processing	Categories of personal data processed
Execution of recruitment process	Complying with obligations applicable to the Company; Candidate's consent;	<ul style="list-style-type: none"> ■ Personal identification data; ■ Contact details; ■ Data on qualification and experience; ■ Recommendations, employers' feedback; ■ Remuneration data; ■ Health information; ■ Other information
Administration of Applicants' database	Candidate's consent;	<ul style="list-style-type: none"> ■ Personal identification data; ■ Contact details; ■ Data on qualification and experience; ■ Recommendations, employers' feedback; ■ Remuneration data; ■ Other information

The Company needs to process data to take steps at your request prior to entering into a contract with you. It also needs to process your data to enter into a contract with you.

In some cases, the Company needs to process data to ensure that it is complying with its legal obligations. For example, it is required to check a successful applicant's eligibility to work in the UK before employment starts.

Processing data from job applicants allows the Company to manage the recruitment process, assess and confirm a candidate's suitability for employment and decide to whom to offer a job. The Company may also need to process data from job applicants to respond to and defend against legal claims.

The Company processes health information if it needs to make reasonable adjustments to the recruitment process for candidates who have a disability. This is to carry out its obligations and exercise specific rights in relation to employment.

For some roles, the Company is obliged to seek information about criminal convictions and offences. Where the Company seeks this information, it does so because it is necessary for it to carry out its obligations and exercise specific rights in relation to employment.

If your application is unsuccessful, the Company will keep your personal data on file for a period of 6 months in case there are future employment opportunities for which you may be suited. The Company will ask for your consent before it keeps your data for this purpose and you are free to withdraw your consent at any time.

V. Who has access to data?

Your information will be shared internally for the purposes of the recruitment exercise. This includes members of the HR Department, interviewers involved in the recruitment process and managers in the business area with a vacancy the performance of their roles.

The Company will not share your data with third parties, unless your application for employment is successful and it makes you an offer of employment. The Company will then share your data (specifically, your name, and the role that you have been offered) where consent is given with former employers to obtain references for you and where required for the role being performed the Disclosure and Barring Service to obtain necessary criminal records checks. The Company can collect your data on convictions and criminal offenses (convictions) only in cases when this data is necessary to verify whether you meet the requirements established by legal acts for the performance of duties or performance of work functions.

Your personal data may be transferred to:

- Companies within the Group;
- Pre-trial investigation bodies, courts, bailiffs, notaries.

VI. How does the company protect data?

The Company takes the security of your data seriously. It has internal policies and controls in place to ensure that your data is not lost, accidentally destroyed, misused or disclosed, and is not accessed except by our employees in the proper performance of their duties.

VII. For how long does the company keep data?

If your application for employment is unsuccessful, the Company will hold your data on file for 6 months after the end of the relevant recruitment process. If you agree to allow the Company to keep your personal data on file, the Company will hold your data on file for a further 6 months for consideration for future employment opportunities. At the end of that period or once you withdraw your consent, your data is deleted or destroyed.

If your application for employment is successful, personal data gathered during the recruitment process will be transferred to your personnel file and retained during your employment. The periods for which your data will be held will be provided to you in the Company's Employee Privacy Notice.

VIII. Your rights

As a data subject, you have a number of rights. You can:

- access and obtain a copy of your data on request;
- require the Company to change incorrect or incomplete data;
- require the Company to delete or stop processing your data, for example where the data is no longer necessary for the purposes of processing;
- object to the processing of your data where the Company is relying on its legitimate interests as the legal ground for processing; and
- ask the Company to stop processing data for a period if data is inaccurate or there is a dispute about whether or not your interests override the Company's legitimate grounds for processing data;
- receive the personal data concerning yourself, which you have provided to the Company, in a structured, commonly used and machine-readable format;
- withdraw your given consent;
- submit a complaint to supervisory authority

If you would like to exercise any of these rights, please contact the Data Controller as per paragraph XI below.

You can make a subject access request by completing the Company's form for making a subject access request.

Your request will be processed within 30 calendar days from the date on which the request is lodged. This period may be extended by another 30 calendar days by notifying You in advance if the request concerns a large amount of personal data or if other requests are being processed at the same time. The answer shall be provided to You via email, unless you'll indicate other preferred form.

If you believe that the Company has not complied with your data protection rights, you can complain to the Information Commissioner on 0303 123 1113. More information can be found on their website <https://ico.org.uk>.



Charles Bellm
Managing Director

Date: 20th June 2023

IX. What if you do not provide personal data?

You are under no statutory or contractual obligation to provide data to the Company during the recruitment process. However, if you do not provide the information, the Company may not be able to process your application properly or at all.

X. Automated decision-making

Recruitment processes are not based solely on automated decision-making.

XI. What are the contacts of the data protection officer?

If you have any questions about data processing, you can contact us ISGDPO@intersurgical.com.

XII. Notice updates

Intersurgical constantly reviews this Notice and if we make substantial changes to the Notice, we will let you know.