

## Recruitment Privacy Notice

## Introduction

Giacom is committed to protecting your privacy. We believe in using your personal information to make things simpler and better for you. We will always keep your personal information safe. We'll be clear and open with you about why we collect your personal information and how we use it. Where you have choices or rights, we'll explain them to you and respect your wishes.

This notice explains how we obtain and use your information when you apply for a job with us. Please take a few minutes to read it before submitting your application or CV.

If we offer you a role, we'll give you a copy of our employee privacy policy which tells you how we use your personal information once you're working here.

## Who controls your information?

The information we collect during the recruitment process is held and used by one of the companies that make up our group within Giacom. Where we use 'we', 'us', 'our' or 'Giacom' in this document, we mean any of the listed registered companies at the end of this notice.

We are required to process data in accordance with the Data Protection Act 2018. To comply with local data protection law, Giacom is registered as a 'Data Controller' with the Information Commissioner's Office (ICO) and details are published on a public register at <https://ico.org.uk> and registration numbers can be found at the end of this notice.

## What information do we collect about you?

Most of the personal information we hold comes from you directly (e.g. contact details, previous employment) or indirectly (e.g. things you tell us in an interview). However, if you have applied through a recruitment agency, they may give us your basic details.

Social media is a great way of finding people, and if our recruitment team has approached you about a vacancy, we may have obtained your contact details from sites such as LinkedIn, together with any publicly visible information about your skills or experience.

We undertake pre-employment checks that may include credit reference and criminal record checks, address verification, confirmation of academic or professional qualifications, and requesting employer or other references. Your information will be shared with an appropriate organisation conducting these checks, for example Experian or The Disclosure and Barring Service.

We may also collect information from you directly, including a photograph at the time of recruitment if you are successful. This is necessary for the performance of a contract with you to ensure you have all access required to appropriate locations to complete your job role.

We collect information from the device you use to visit our site and submit your application or CV, including IP address (a number that identifies a specific device on the internet and is required for that device to communicate with websites), hardware model, operating system and version, software, preferred language, serial numbers, device motion information, mobile network information and location data. We also collect server logs, which can tell us dates and

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times of access, content or pages viewed, crashes and other system activity and the website you were using immediately before visiting our site. We use this information to:

- Ensure that our site works properly for your device
- Identify errors on the site
- Understand how people reach our site
- Assess the effectiveness of our site and its content

‘Cookies’ are small text files stored in your web browser that enable us to recognise your computer when you visit one of our websites. They are essential to keep our websites functioning correctly and securely, and we use them on our careers pages to:

- Enable you to move around the site and log into your account
- Deliver content in a way that works for the device you’re using
- Remember choices you’ve made, location information and enable features such as password re-setting
- See how many people visit our website and to review their on-site journey, including which pages or features are most popular
- Identify whether and where people see error messages
- Remember the last job-category that you have visited

To do these things, cookies collect some information about you, but we don’t link it to you as a named individual. Although we use cookies only in ways that are essential and which have minimal impact on your privacy you can choose to accept or reject some or all types of cookies through your device’s browser settings. Please note that if you do this, some parts of the website may not work properly or at all.

## How long will we process your personal information?

If you are successful in your application to work for us, we will process this information for the duration of our work relationship. When your work relationship with us begins, we will issue you with a Staff Privacy Notice detailing how we will process your data during our work relationship with you and after it ends.

If you are unsuccessful in your application to work for us or you choose not to accept the offer of a work contract with us (if applicable) we will hold limited specified information necessary for legal reasons for a period of 6 months or such other period as may be required under our legal obligations.

## How we use your information

As you’d expect, we use your personal information to keep the recruitment process running smoothly from end to end.

Our team will use the contact details you have provided to get in touch with you by phone, e-mail, post or SMS about the recruitment process and your application. You will be able to inform us of your preferred contact method. Please remember to ensure that the contact details you give us are sufficiently private to receive information about your application.

Where an application for a role is made, we are required to comply with a range of legal and regulatory obligations such as employment law, diversity and equality and health and safety rules. To fulfil the range of requirements and obligations, we hold your information for 6 months after an unsuccessful application. Meanwhile, if your application

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was successful, the details we hold about you on our recruitment system will form the basis of your future employee record.

Once this time has passed, we will provide you with information regarding processing of your data and you will have the option to opt out. Teamtailor will send you an Automatic permission renewal request email informing you that you can choose to opt-out. At the bottom of the automatic email, there will be a 'remove my data' button and your data will be removed automatically once this is clicked.

Where you opt to create a profile on the Teamtailor site through the Connect feature, we will review the details you provide against other roles that come up, to present you with similar roles and contact you about any vacancies that we think might interest you. You will only be contacted for this purpose where you opt-in to receive communications and this consent can be withdrawn at any point.

Your data permission preferences can be updated at any time. If you want to update your data and privacy settings in your Teamtailor account, these can be accessed via the 'settings' function. In here, you have the option to toggle on and off whether we can contact you about future job opportunities. You can also request data we hold about you, and you can choose to remove your data and view our privacy policy and our cookie policy.

Where we need to carry out reporting or statistical analysis about our recruiting process, we anonymise the data so that it cannot be linked back to an individual.

## More sensitive information

If you tell us about a disability or long-term condition, we'll only use that information to make any appropriate adjustments in our interview/application process and, if you are successful, in your new work environment.

Information you provide via our Equality and Diversity questionnaire about ethnicity, gender, sexuality, religion, or disability is used only to help us fulfil our diversity and equality monitoring requirements. You do not have to provide this information.

## How we share your information

Like most organisations we use external companies to carry out some aspects of our business, as well as systems and tools provided or hosted externally. Where personal information is processed by a third party, we carry out checks to ensure that they will give it the same level of care and protection as we do. Giacom is obliged to handle your information in accordance with data protection law, and we are required to put in place contractual measures with any third parties we engage reinforcing those obligations.

Where personal information is transferred outside the United Kingdom and Europe, we put in place additional legal protections to ensure it receives the same level of protection as required under local privacy law. We do this by using standardised contractual clauses (sometimes called 'the EU Model Clauses') approved by the European Commission and European privacy regulators, although there are approved alternative legal mechanisms which we can decide to use instead.

Your details are held on systems hosted by Teamtailor AB.

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Other than as set out in this document, we do not share your personal information with third parties unless we are compelled or permitted by law and we have received a warrant, court order or other legally valid proof of authority.

## Your rights

### The Right to Have Errors and Inaccuracies Corrected

You can contact the recruitment team and we'll update inaccuracies within a month. If we take the decision not to make a change you have requested, we will explain why and make a note on your account to show that you requested it. Alternatively, you may be able to correct information yourself where it relates to a profile you have created.

### Your Right of Erasure (Sometimes Referred to as the 'Right to Be Forgotten')

You have the right to request erasure of your personal data where our original purpose for collecting the data has been completed and we have no other valid legal grounds for continuing to hold it. You can raise a request for erasure by contacting our Data Protection Officer, where your request will be received and assessed by the Data Protection Team. As explained above, we hold your details for 6 months after your application to enable us to fulfil our legal and regulatory requirements and deal with any queries. In these circumstances, as there remains a valid legal basis for holding the data, we will not delete the information earlier than our mandated retention.

### Your Right to See the Data We Hold About You

If you would like a copy of the personal information we hold about you, you should request it by emailing the Data Protection Officer, details can be found on the ICO's register. We will ask you to complete a form, which is not compulsory but helps us to provide any specific information you are looking for. We will also ask you for valid proof of identity. Once we have received the necessary information, we will provide our response within one month.

### Your Right of Objection to Certain Types of Processing

As this notice explains, most of the things we do with your personal information are necessary in order to progress with your application, and some are necessary to meet our legal obligations. There is one activity that falls outside those categories, but which are still important and which we have a legitimate interest in doing as a business. Data Protection law gives you a right to object to activities that fall into this category if your rights and freedoms outweigh our legitimate business interest.

It is:

Our use of information on your profile to present jobs we think may be of interest to you. We aim to facilitate your use of the site and search for a role. As a result, where you create a profile, we will use the details inputted, including the preferences you have registered and your previously viewed roles, to present you with related jobs we think may be of interest. Creation of a profile is entirely optional, and you can edit your preferences at any point. If you wish to exercise your right to object to this processing, you can request deletion of your profile (your Right of Erasure).

### Your Right to Complain to the Regulator

If you believe your privacy rights have been infringed, or you disagree with a decision we have made about your personal information, you have the right to complain to the privacy regulator. We are based in the UK, so our data

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protection regulator is the UK's Information Commissioner's Office (ICO), which may be contacted at <https://ico.org.uk>, but if you are in any EU country you may prefer to initiate contact through the regulator in your country of residence.

## Companies Within Our Group

Giacom (Communications) Limited, Company No 04211657, ICO registration Z560363X  
Giacom (Distribution) Limited, Company No 02114602, ICO registration ZB290502  
Giacom (Worldwide) Limited, Company No 04290183, ICO registration Z8556712  
Giacom (Cloud) Limited, Company No 03813447, ICO registration Z8614039  
Giacom (Billing) Limited, Company No 03089574, ICO registration Z7474338  
Giacom (Platforms) Limited, Company No 5425077, ICO registration ZA154556  
Giacom (Development) Limited, Company No 08108254, ICO registration ZA792221.  
Inform Billing Solutions Limited, Company No 07132859, ICO registration Z3112303.

## Do you need extra help?

If you would like this notice in another format (for example: audio, large print, braille) please contact us using the details set out on our website [www.Giacom.com](http://www.Giacom.com).