

GRIPPLE LIMITED RECRUITMENT PRIVACY NOTICE

What is the purpose of this document?

GRIPPLE LIMITED is a "data controller". This means that we are responsible for deciding how we hold and use personal information about you. You are being sent a copy of this privacy notice because you are applying for work with us (whether as an employee, worker or contractor). It makes you aware of how and why your personal data will be used, namely for the purposes of the recruitment exercise, and how long it will usually be retained for. It provides you with certain information that must be provided under the General Data Protection Regulation ((EU) 2016/679) (GDPR).

Data protection principles

We will comply with data protection law and principles, which means that your data will be:

- Used lawfully, fairly and in a transparent way.
- Collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes.
- Relevant to the purposes we have told you about and limited only to those purposes.
- Accurate and kept up to date.
- Kept only as long as necessary for the purposes we have told you about.
- Kept securely.

The kind of information we hold about you

In connection with your application for work with us, we will collect, store, and use the following categories of personal information about you:

- The information you have provided to us in your curriculum vitae and covering letter.
- The information you have provided via the online application system, including name, address, telephone number, personal email address, employment history and qualifications.
- If your application is through our friends and family scheme.
- Any information you provide to us during an interview.
- The information we collect about if you take part in an assessment day.
- Your test results if you are asked to take a test as part of your application.
- Information required in order for us to conduct a legal right to work check.
- We may also collect, store and use the following types of more sensitive personal information:

- Information about your health, including any medical condition, health and sickness records. (but only if you choose to disclose this to us in advance of your interview in order for us to make reasonable adjustments for you.)
- Information about criminal convictions and offences (if we offer you a position and this information is applicable to the role).

Please note that should you be successful in your application, all of this data will form part of your employment record.

Please also be advised that when you visit the [gripple.com](https://www.gripple.com) website, and even if you do not make a job application, cookies will be used to collect information about you and your visit. Details of the cookies we use and how you can control them are set out in our Cookie Notice - see <https://www.gripple.com/gb/en/cookies-policy>.

How is your personal information collected?

We collect personal information about candidates from the following sources:

- You, the candidate. This may include information you provide directly to us or information we collect from your social media accounts.
- Recruitment agencies if they submit your details to us on your behalf.
- Disclosure and Barring Service in respect of criminal convictions (if applicable to the role).
- Your named referees.

Why we collect information about you and lawful basis

We will use the personal information we collect about you to:

- Assess your skills, qualifications, and suitability for the role.
- Carry out background and reference checks, if applicable and you are offered a position.
- Make reasonable adjustments for you when you at interview where appropriate.
- Communicate with you about the recruitment process.
- Communicate with your referees if you are offered a position.
- To check your legal right to work if you are offered a position.
- Keep records related to our hiring processes.
- Comply with legal or regulatory requirements.

We will use the information you provide to us to process your application and assess your suitability for the role.

The lawful basis we rely on for processing your personal data is processing necessary to perform a contract, which includes processing your personal information before deciding whether to enter into a contract of employment with you.

If you provide us with any information about reasonable adjustments you require under the Equality Act 2010 the lawful basis we rely on for processing this information is to comply with our legal obligations.

We are also under a legal obligation to notify you if your application is unsuccessful or check your legal right to work if you are offered a position.

Please see the Information about criminal convictions section below for our legal basis for processing this information.

If you do not provide personal information

If you do not provide information when requested, which is necessary for us to consider your application (such as evidence of qualifications or work history), we will not be able to process your application successfully and we will not be able to take your application further.

How we use particularly sensitive personal information

We will use your particularly sensitive personal information in the following ways:

- If you provide us with any information about reasonable adjustments you require due to a disability, we will use this information to consider whether we need to provide appropriate adjustments during the recruitment process, for example whether adjustments need to be made during a test or interview.

Information about criminal convictions

We will specify if the role requires us to process information about criminal convictions.

We have in place an appropriate policy document which we are required by law to maintain when processing such data.

Automated decision-making

You will not be subject to decisions based on automated decision-making.

Final recruitment decisions are made by hiring managers and members of our recruitment team and we take account of all the information gathered during the application process.

Data sharing and talent pool

We will not share your information with third parties for marketing purposes.

We will only share your information with the following in order to process your application:

People Apps Limited

We use People Apps Limited to operate our online application system using the People HR software system. We will store online applications and any paper applications we receive on this system.

If you accept an offer from us, we will also create an employee file and store your details on the People HR software system.

Here is a link to the People Apps Limited privacy notice - <https://www.peoplehr.com/privacy.html>

When you submit your application, we will also seek your consent to add your details to our talent pool in the event that your application is unsuccessful, but a suitable alternative vacancy arises in Gripple or the GLIDE group of companies in the future. The GLIDE group is an independent group of employee-owned companies which have a close relationship with Gripple Limited and share the same values. For details of the GLIDE group of companies see <http://www.glidemembers.com/>. If you consent to your details being added to our talent pool, we will retain them for 24 months from the date of submitting your application.

You have the right to withdraw your consent for processing your data at any time. To withdraw your consent, please contact work@gripple.com or the Gripple Limited People & Culture Team GLIDE House, Terry Street, 300 Attercliffe Common, Sheffield S9 2AG. Once we have received notification that you have withdrawn your consent, we will no longer process your application and, subject to retaining your details for 6 months, we will dispose of your personal data securely.

Our third-party service provider and the GLIDE group of companies 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 provider to use your personal data for its own purposes. We only permit it to process your personal data for specified purposes and in accordance with our instructions.

Data security

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. Details of these measures may be obtained from work@gripple.com or the Gripple Limited People & Culture Team, GLIDE House, Terry Street, 300 Attercliffe Common, Sheffield S9 2AG.

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.

Data retention

How long will you use my information for?

If your application is successful, we will retain the personal information we have collected in relation to your application on your employee file.

If your application is unsuccessful, we will retain your personal information for a period of 6 months after we have communicated to you our decision unless you have consented to us adding your details to our talent pool and retaining them for 24 months as detailed above. We retain your personal information for 6 months so that we can show, in the event of a legal claim, that we have not discriminated against candidates on prohibited grounds and that we have conducted the

recruitment exercise in a fair and transparent way. Please note that if a claim or potential claim is brought to our attention during the above 6-month period we will continue to retain the data until the issue is resolved.

If you send us a speculative CV or apply through our friends and family scheme, we will retain your details for a period of 24 months in case a suitable vacancy arises during that period.

After the expiry of the above periods, we will securely destroy your personal information in accordance with applicable laws and regulations. However, if you notify us that you do not want to be contacted by us again in the future you will be added to our suppression list to ensure we do not locate your details from public sources e.g. a LinkedIn account, and accidentally contact you if a vacancy arises in the future.

Rights of access, correction, erasure, and restriction

Your rights in connection with personal information

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

- **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.
- **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.
- **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).
- **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.
- **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.
- **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 work@gripple.com or the Gripple Limited People & Culture Team GLIDE House, Terry Street, 300 Attercliffe Common, Sheffield S9 2AG.

Data protection manager

We have appointed a data protection manager to oversee compliance with this privacy notice. If you have any questions about this privacy notice or how we handle your personal information, please contact the data protection manager at dataprotection@gripple.com or Data Protection Manager,

Gripple Limited, The Old West Gun Works, Savile Street East, Sheffield, S4 7UQ. You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues.

We reserve the right to update this privacy notice at any time, and our gripple.com website will display our most up to date privacy notice. We may also notify you in other ways from time to time about the processing of your personal information.