

Fair Processing Notice for Job Applicants

IN-SYNC Group Ltd (including its subsidiaries IN-SYNC Digital Ltd, IN-SYNC Tax LLP, IN-SYNC Outsourcing Ltd and IN-SYNC Credit Services Ltd) is aware of its obligations under the General Data Protection Regulation (GDPR) and is committed to processing your data securely and transparently. This Fair Processing Notice explains how we will use the personal data of job applicants, during and after the recruitment process with IN-SYNC.

Our contact details

4 The Millennium Centre, Crosby Way, Farnham, Surrey, GU9 7XX

Telephone Number: 01252 704030

Our Data Protection Officer is Carmen Irvine, she can be emailed at dpo@in-syncgroup.com.

How we collect your personal data, what we collect and why

The law on data protection allows us to process your data for certain reasons only:

- in order to perform an employment contract which we are party to;
- in order to carry out legally required duties;
- in order for us to carry out our legitimate interests; and
- with your consent.

When you apply for a position with IN-SYNC, this is with your consent. Our processing of your data is because we have a legitimate interest in processing personal data during the recruitment process and for keeping records of the process. Processing data from job applicants allows us to manage the recruitment process, assess and confirm a candidate's suitability for employment and decide to whom to offer a job. IN-SYNC may also need to process data from job applicants to respond to and defend against legal claims.

We may collect information about whether or not applicants are disabled in order to make reasonable adjustments for candidates with a disability to attend an interview. We process such information to carry out our legal obligations under employment law.

IN-SYNC will not use your data for any purpose other than the recruitment exercise for which you have applied, unless you are successful in your application, after which it will become part of your HR file. If you are unsuccessful, your personal data will be held for six months in case of any employment law claims, which is a legitimate interest of IN-SYNC.

As part of any recruitment process, we will collect a range of information about you, which includes:

- your name, address and contact details including email address and telephone number;
- information included on your CV including employment history, education history, qualifications and skills;
- information about your current level of remuneration, including benefit entitlements;
- whether or not you have a disability for which we need to make reasonable adjustments during the recruitment process.

IN-SYNC will collect this information in a variety of ways, e.g. data might be contained in application forms or CVs, obtained from your passport or other identity documents, or collected through interviews or other forms of assessment. We may also collect personal data about you from third parties, such as employment agencies. Personal data is kept in personnel files or within the Group's HR and IT systems.

Who has access to your data?

Your information may be shared internally within IN-SYNC Group for the purposes of the recruitment exercise, this is a legitimate activity for us. This includes members of the HR and recruitment team, interviewers involved in the recruitment process, managers in the business with a vacancy, and IT staff if access to the data is necessary for the performance of their roles.

IN-SYNC will not share your data with third parties, unless your application for employment is successful and we make you an offer of employment, at which point we will seek reference details from you and we will then share your name with the referee and receive information back from them.

Do we transfer your personal data outside of the EU or EEA?

Your data is kept within the EU or EEA, except for data that is processed by SmartSheet Inc., a technology application used by us to create administrative spreadsheets.

SmartSheet Inc. is located in the USA, which is a non-adequate country for data transfer as determined by the European Commission. Your data is protected by SmartSheet Inc. as they participate in and have certified their compliance with the EU-U.S. and US-Swiss Privacy Shield Frameworks and Principles (collectively, the "Privacy Shield Principles").

SmartSheet will comply with the Privacy Shield Principles with respect to the personal data that it receives in the United States from the European Economic Area and Switzerland. You can review the Privacy Shield Principles, learn more about Privacy Shield, and view SmartSheet Inc.'s Privacy Shield certification at <https://www.privacyshield.gov/>. SmartSheet's commitments under the Privacy Shield are subject to the investigatory and enforcement powers of the United States Federal Trade Commission.

How do we protect data?

IN-SYNC 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. These measures and controls include staff training and awareness campaigns, locked document storage and archiving, secure server environments and network infrastructure, controlled access to all personal data on a user level and job purpose basis, confidential waste bins and encrypted email.

For how long will we keep your data?

If your application for employment is unsuccessful, we will hold your data on file for 6 months after the end of the relevant recruitment process, this is a legitimate interest for us in the unlikely event of any employment law claims. At the end of that period, your data will be deleted or destroyed.

We may request to hold your data for longer than 6 months for consideration for future employment opportunities, however this will only be the case where you provide consent.

If your application for employment is successful, personal data gathered during the recruitment process will be transferred to your personnel file and retained for the duration of, and for 7 years after, your employment. The periods for which your data will be held will be provided to you in a new privacy notice.

Automated decision-making

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

Your rights in relation to your data

You have rights in respect of our processing of your personal data which are:

- To access to your personal data and information about our processing of it. You also have the right to request a copy of your personal data (but we will need to remove information about other people).
- To rectify incorrect personal data that we are processing.
- To request that we erase your personal data if:
 - we no longer need it;
 - if we are processing your personal data by consent and you withdraw that consent;
 - if we no longer have a legitimate ground to process your personal data; or
 - we are processing your personal data unlawfully
- To object to our processing if it is by legitimate interest.
- To restrict our processing if it was by legitimate interest.
- To request that your personal data be transferred from us to another company if we were processing your data under a contract or with your consent and the processing is carried out automated means.

There will be no consequences for withdrawing your consent. If you wish to exercise any of the rights explained above, please contact dpo@in-syncgroup.com. You have the right to lodge a complaint with the Information Commissioner's Office at <https://ico.org.uk/make-a-complaint/your-personal-information-concerns/>.