

Introduction

This Job Applicant Privacy Notice sets out what personal data we, Autocraft Solutions Group, hold about you and how we collect and use it during and after the recruitment process. It applies to anyone who is applying to work for us, whether as an employee, worker, contractor, consultant, intern, volunteer, partner, or director together referred to as 'Job Applicant' or 'you.'

We are required by data protection legislation to give you the information in this Privacy Notice. It is important that you read the Privacy Notice carefully, together with any other similar or additional information that we might give you from time to time about how we collect and use your personal data. Should your application be successful, when you start work for us, we will provide you with another privacy notice that explains how we deal with your personal data whilst you are working for us.

We may update this Privacy Notice at any time.

Who is the controller?

The corporate entities listed below are Data Controllers. This means that if you apply for a position in any one of them it is responsible for deciding how it holds and uses personal data about you. The registered addresses are as follows:

- **Autocraft Drivetrain Solutions** – Syston Lane, Belton, Grantham, Lincolnshire NG32 2LY.
- **Autocraft Machining Solutions** – Booth Drive, Park Farm South Industrial Estate, Wellingborough, Northamptonshire, NN8 6GR.
- **Vertex Engineering Solutions** - Units 24 & 16 Boulton Industrial Estate, Hockley, Birmingham, B18 5AU.
- **EV Solutions BV** – Westervoortsedijk 73, 6827 AV, Arnhem, Netherlands.

What type of personal data do we hold about you and why?

We collect and use various types of personal data about you as part of the recruitment process. The types of personal data that we may hold about you include the following:

At the initial stages of recruitment.

- Information contained in your application form/CV/covering letter, including your name, title, contact details, photograph, employment history, experience, skills, qualifications/training (including educational, vocational, driving licenses where appropriate), referees' names and contact details, etc.
- Any information our provide to us at interview.
- Publicly available information about you, such as your business social media presence.
- Selection information, including correspondence, interview notes, internal notes, the results of any written or online selection tests.

If you are shortlisted for a position, or you receive a conditional offer of employment.

- Pre-employment check information, including references from third parties and verification of qualifications.
- Right to work checks and related documents.

We hold and use this personal data so that we can:

- process your application and correspond with you about it.

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- assess whether you have the required skills, experience, qualifications, and training for a role within the Company.
- make informed recruitment decisions.
- verify information provided by you.
- check and demonstrate that you have the legal right to work in the UK.
- keep appropriate records of our recruitment process and decisions.

What are our legal grounds for using your personal data?

Data protection legislation specifies the legal grounds on which we can hold and use personal data. We rely on one or more of the following legal grounds when we process your personal data:

- **Legitimate Interest** - Where it is necessary for our legitimate business interests (or those of a third party), and your interests and fundamental rights do not override those interests. In respect of recruitment, this may include but is not limited to the legitimate interest to bring people, skill, and capability into the business. Processing personal data about candidates allows us to manage the recruitment process, assess and confirm a candidate's suitability for employment or engagement and decide who to make an offer to. We may also need to process personal data about candidates to respond to and defend against legal claims.
- **If we determine to recruit you:**
 - **Performance of the contract** - Where we need it to develop, perform, operate, and administer a contract with you (this could be an employment contract, a contract for services, or another type of contract).
 - **Legal Obligation** - Where we need it to comply with a legal obligation. Typically, as part of a recruitment process this may include but is not limited to legal obligations such as ensuring we have carried out appropriate right to work checks.

What type of special category personal data do we hold about you, why, and on what legal grounds?

We will only collect, hold, and use limited types of special category data about you during the recruitment process. Since special category data is usually more sensitive than other personal data, we need to have legal grounds in addition to those mentioned above to collect, hold, and process it. These additional legal grounds are explained below for each type of special category data.

Equal opportunities monitoring

Equal opportunities monitoring data, is data which could include information about your race or ethnicity, religious beliefs, sexual orientation, or health. We use this information to monitor equality of opportunity and diversity in our recruitment process. Our additional legal ground for using this information is that it is necessary in the public interest for the purposes of equal opportunities monitoring and is in line with our Data Protection Policy and that you have given us your explicit consent to do so.

Adjustments for disability/medical conditions

Any information relevant to any request by you for adjustments to the recruitment process, as a result of an underlying medical condition or disability. We use this information to enable us to carry out a fair, non-discriminatory recruitment process by considering/making reasonable adjustments to our processes as appropriate. Our additional legal ground for using this information is that we need it to comply with a legal obligation not to discriminate, and to make reasonable adjustments to accommodate a disability and that you have given us your explicit consent to do so.

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Criminal records information/Disclosure & Barring Service (DBS) checks

For certain positions, we may request criminal records checks from the DBS. We use this information to assess your suitability for the role and verify information provided by you. Our additional legal ground for using this information is that you have given us your explicit consent to do so.

How do we collect your personal data?

You provide us with most of the personal data about you that we hold and use, for example in your written application, by completing any assessments and during any interviews.

Some of the personal data we hold and use about you is generated from internal sources during the recruitment process. For example, the person interviewing you may score your suitability for the role, and we record the reasons for decisions made about whether or not your application is successful.

Some of the personal data about you that we hold, and use may come from external sources. For example, a recruitment agency provides us with a shortlist of candidates. If we offer you a role, we will carry out pre-employment checks, such as taking up references from past employers or education providers and we may check your qualifications by contacting the awarding body. We may seek a criminal record check from the DBS. In some circumstances, we may ask the Home Office for information about your immigration status to verify your right to work in the UK. For some roles, we may also obtain information about you from publicly available sources, such as your LinkedIn profile or other media sources.

Who has access to your personal data?

Your personal data may be shared internally for the purposes of the recruitment exercise. This includes, with other corporate entities within the Group, members of the HR and recruitment team, interviewers involved in the recruitment process, managers in the business area with a vacancy and IT staff if access to the data is necessary for the performance of their roles.

We may also share your personal data with third parties:

Recruitment agencies

We engage recruitment agencies to provide us with the details of suitable candidates for our available vacancies, to communicate with those candidates, and to handle administration in connection with the recruitment process. If we have received your initial application details from a recruitment agency, we will share with them any of your personal data that is necessary to enable them to fulfil their functions for us.

Medical/occupational health professionals

We may share information relevant to any request by you for adjustments to the recruitment process as a result of an underlying medical condition or disability with medical/occupational health professionals to enable us to identify what, if any, adjustments are needed in the recruitment process and, if you are successful, once you start work. This information may also be used by the medical/occupational health professionals to carry out assessments required by health and safety legislation.

Legal/professional advisers

We may share any of your personal data that is relevant, where appropriate, with our legal and other professional advisers, in order to obtain legal or other professional advice about matters related to you or in the course of dealing with legal disputes with you or other Job Applicants.

Reference and Background Check Providers

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We may share your personal data where we need to make reference enquiries or conduct background checks in connection with your application.

Home Office

We may share your right to work documentation with the Home Office, where necessary, to enable us to verify your right to work in the UK.

As a general rule, we will not transfer your personal data to countries outside the European Economic Area. There are adequacy regulations in respect countries within the EEA, which means that there is an adequate level of protection for your personal data in these countries.

In the event that you work for Autocraft Solutions Group in another country, your personal data may be transferred to countries outside the European Economic Area (EEA) for performance of the contract, compliance with our legal obligations in our day-to-day operations and legitimate business interests. In these cases, personal data is transferred outside the EEA on the basis of identified safeguards being in place.

Consequences of not providing personal data

We only ask you to provide personal data that we need to enable us to make an informed decision about whether or not to offer you a role. If you do not provide particular information to us, then we will have to make a decision on whether or not to offer you a role without that information, which in some cases could result in us deciding not to recruit you. For example, if we ask you to provide a certificate verifying a qualification and you do not, we will have to decide whether to recruit you without that information. If you do not provide us with names of referees or a reference when asked, we will not usually be able to offer you the role. In addition, some of the personal data you provide to us is required by law. For example, we need to check your right to work in the UK, if you do not provide us with the documentation to enable us to perform those checks, then we cannot by law employ you.

If you choose not to provide us with the data requested, we will tell you about the implications of any such decision at the relevant time.

How do we protect your personal data?

We take the security of your personal data seriously. We have put in place appropriate technical and organisational measures to prevent your personal data from being accidentally lost, destroyed, used, or accessed in an unauthorised way, altered, or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who need to access it in the proper performance of their roles for us. They will only process your personal data on our instructions, and they are subject to a duty of confidentiality. These measures are in accordance with applicable laws and regulations.

Where we engage third parties to process your personal data on its behalf, they are also obliged to implement appropriate technical and organisational measures to ensure the security of data.

How long will we keep your personal data?

We will keep your personal data throughout the recruitment process.

If your application is successful, when you start work for us you will be issued with an Employee Privacy Notice which will include information about what personal data, we keep from the recruitment process and how long we keep your personal data whilst you are working for us and after you have left.

If your application is unsuccessful, we will keep your personal data for up to 6 months from the date we notify you of our decision. Please note that we may keep your personal data for longer than 6 months if you have asked us to

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consider you for future vacancies. There may be other circumstances where it is appropriate for us to keep particular items of your personal data for longer. We will base these decisions on relevant circumstances taking into account the following criteria:

- the amount, nature, and sensitivity of the personal data.
- the risk of harm from unauthorised use or disclosure.
- the purposes for which we process your personal data and how long we need the particular data to achieve these purposes.
- how long the personal data is likely to remain accurate and up to date.
- for how long the personal data might be relevant to possible future legal claims
- any applicable legal, accounting, reporting or regulatory requirements that specify how long certain records must be kept.

In all cases, we will not keep your personal data for longer than we need it for our legitimate purposes.

Will we keep your application on file?

If you are unsuccessful in your application, or you have sent us a speculative application, provided that you have consented for us to do so, we will keep your application on file for 12 months and may contact you in the event of a suitable vacancy arising. We will not keep your personal data for this purpose for longer than 12 months.

If you change your mind about us keeping your personal data on file, you have the right to withdraw your consent at any time – see ‘Your Rights,’ below.

References and Referees

We will usually seek references as part of the recruitment process. If you give us details of referees, we require you to inform them what personal data of theirs you are giving to us. You must also give them our contact details and let them know that they should contact us if they have any queries about how we will use their personal data.

Your rights

You do have legal rights relating to your personal data, which are outlined here:

- **The right to make a subject access request** - This enables you to receive certain information about how we use your data, as well as to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.
- **The right to request that we correct incomplete or inaccurate** personal data that we hold about you.
- **The right to request that we delete or remove** personal data that we hold about you 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 data where you have exercised your right to object to processing (see below).
- **The right to object to our processing** your personal data where we are relying on our legitimate interest (or those of a third party), where we cannot show a compelling reason to continue the processing.
- **The right to request that we restrict our processing** of your personal data. This enables you to ask us to suspend the processing of personal data about you, for example if you want us to establish its accuracy or the reason for processing it.
- **The right to withdraw your consent to us using your personal data.** As described above, we do not normally rely on your consent as the legal ground for using your personal data. However, if we *are* relying on your consent as the legal ground for using any of your personal data and you withdraw your consent, you also have the right to request that we delete or remove that data, if we do not have another good reason to continue using it.

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- **The right to request that we transfer** your personal data you have provided to us, to you or to another party, in certain limited circumstances.

These rights are not absolute, and in some circumstances, we may be entitled to refuse some, or all of your request.

If you would like to exercise any of the above rights or have any questions or concerns about how we use your personal data, please contact the Human Resources Department in writing.

You also 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. Details of how to contact the ICO can be found on their website: <https://ico.org.uk>

Document History

Rev	Section	Revision Detail	Author	Approver	Issue Date
1	All	New	MP	SH	16.05.2018
2	All	Rebranding to ASG	L Paukina	M Percival	26.06.2018
3	All	Major Update	T Pugh	B Barr	22 August 2024