



PRIVACY NOTICE - Recruitment

Introduction

Being part of Karian and Box means becoming part of a business to be proud of and it's our people who make us successful. People Power Performance, and our recruitment process aims to secure the best talent. Both during and after the recruitment process, your privacy is important to us. Karian and Box is committed to protecting the privacy and security of your personal information and this Privacy Policy describes how we comply with our legal obligations to you.

The Company must process personal data to successfully recruit and in doing so, the Company acts as a "data controller". This means that we are responsible for deciding how we hold and use personal information about you. We are required under data protection legislation to notify you of the information contained in this Privacy Notice.

This Privacy Notice applies to the personal data of candidates whether this has been collected directly from the applicant or through a recruitment agency, referral or online advertisement.

It is important to point out that we may amend this Privacy Notice from time to time, please visit this page if you wish to stay up to date as we will post any changes here.

Data protection principles

Karian and Box will comply with data protection law. This says that the personal information we hold about you must 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.

Collection of Personal Data

We collect personal information during the application and recruitment process in a number of ways:

- You may give your personal details to the Company directly either by seeking employment with us through submitting your CV to recruitment@karianandbox.com or by applying for a role we have advertised through a job board;
- Your details may have been identified via publicly available sources in relation to your professional history, for example, LinkedIn or job boards where you have posted your CV for recruiters to consider you for opportunities;

- In some circumstances, your personal details may have been provided to us by another person for us to consider employment with us, for example a referral from one of our employees;
- We may sometimes collect additional information from third parties including former employers, or other background check agencies such as Clarity Healthcare.
- Personal data may also be collected during the course of a temporary assignment.

The kind of information we hold about you

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

There are "special categories" of more sensitive personal data which require a higher level of protection.

During the recruitment process, we will collect, store, and use the following categories of personal information about you:

- Personal information that you provide to us including copies of right to work documentation, references and other information included in a CV or cover letter;
- Employment records (including job titles, work history, working hours, training records and professional memberships);
- Location of employment or workplace;
- Personal contact details such as name, title, addresses, telephone numbers, and personal email addresses;
- Proof of address documentation such as utility bill or council tax documentation;
- Date of birth;
- Gender and student loan data as required by HMRC and held on the Starter Checklist form for taxation purposes only;
- Next of kin and emergency contact information;
- National Insurance number;
- Bank account details, payroll records and tax code/P45 information;
- Salary, annual leave, pension and benefits information;
- Copy of driving licence and vehicle insurance documentation.

We may also collect, store and use the following "special categories" of more sensitive personal information:

- Information about your health, including any medical condition, a suitability certificate issued by Clarity Healthcare, and health and sickness records.

How we will use information about you

We will only use your personal information when the law allows us to. Most commonly, we will use your personal information in the following circumstances:

- Where we need to comply with a legal obligation;
- Where we need to perform the contract we have entered with you;
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.

We may also use your personal information in the following situations, which are likely to be rare:

- Where we need to protect your interests (or someone else's interests);
- Where it is needed in the public interest or for official purposes.

Situations in which we will use your personal information

We need all the categories of information listed in “[The kind of information we hold about you](#)” primarily to enable us to comply with legal obligations. In some cases, we may use your personal information to pursue legitimate interests of our own or those of third parties, provided your interests and fundamental rights do not override those interests. The situations in which we will process your personal information are listed below:

- Making a decision about your recruitment or appointment;
- Determining the terms on which you work for us;
- Checking you are legally entitled to work in the UK;
- Administering payroll and the contract we have entered into with you;
- Business management and planning, including accounting and auditing;
- Assessing qualifications and experience for a particular job;
- Complying with health and safety obligations.

Some of the above grounds for processing will overlap and there may be several grounds which justify our use of your personal information.

If you fail to provide personal information

If you fail to provide certain information when requested, we may not be able to perform the contract we have entered into with you (such as paying you or providing a benefit), or we may be prevented from complying with our legal obligations (such as to ensure the health and safety of our workers).

Change of purpose

We will only use your personal information for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If we need to use your

personal information for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal information without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

How we use particularly sensitive personal information

"Special categories" of particularly sensitive personal information require higher levels of protection. We need to have further justification for collecting, storing and using this type of personal information. We may process special categories of personal information in the following circumstances:

- In limited circumstances, with your explicit written consent;
- Where we need to carry out our legal obligations and in line with our Data Protection Policy;
- Where it is needed in the public interest and in line with our Data Protection Policy;
- Where it is needed to assess your working capacity on health grounds, subject to appropriate confidentiality safeguards.

Less commonly, we may process this type of information where it is needed in relation to legal claims or where it is needed to protect your interests (or someone else's interests) and you are not capable of giving your consent, or where you have already made the information public.

Our obligations

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

- We will use information relating to leaves of absence, which may include sickness absence or family related leaves, to comply with employment and other laws;
- We will use information about your physical or mental health, or disability status, to ensure your health and safety in the workplace and to assess your fitness to work, to provide appropriate workplace adjustments, to monitor and manage sickness absence and to administer benefits.

Do we need your consent?

We do not need your consent if we use special categories of your personal information in accordance with our written policy to carry out our legal obligations or exercise specific rights in the field of employment law. In limited circumstances, we may approach you for your written consent to allow us to process certain particularly sensitive data. If we do so, we will provide you with full details of the information that we would like and the reason we need it, so that you can carefully consider whether you wish to consent. You should be aware that it is not a condition of your contract with us that you agree to any request for consent from us.

Automated decision-making

We do not envisage that any decisions will be taken about you using automated means, however we will notify you in writing if this position changes.

Data sharing

We may have to share your data with third parties, including third-party service providers and other entities in the group.

We require third parties to respect the security of your data and to treat it in accordance with the law.

Why might you share my personal information with third parties?

We will share your personal information with third parties where required by law, where it is necessary to administer the working relationship with you or where we have another legitimate interest in doing so.

Which third-party service providers process my personal information?

"Third parties" includes third-party service providers (including contractors and designated agents) and other entities within our group. The following activities are carried out by third-party service providers: financial administration including the administration of expenses, payroll, pensions administration, benefits provision and administration, and IT services.

How secure is my information with third-party service providers and other entities in our group?

All our third-party service providers and other entities in the group 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 providers to use your personal data for their own purposes. We only permit them to process your personal data for specified purposes and in accordance with our instructions.

When might you share my personal information with other entities in the group?

We will share your personal information with other entities in our group including the Employee Sharesave Scheme through the Karian Communications Share Incentive Plan Trust or in the context of a business reorganisation or group restructuring exercise.

What about other third parties?

We may share your personal information with other third parties, for example in the context of the possible sale or restructuring of the business. We may also need to share your personal information with a regulator or to otherwise comply with the law.

Data security

We have put in place measures to protect the security of your information through a range of appropriate technical and organisational measures including:

- Internal policies and procedures setting out our data security approach
- Training for employees
- Third parties will only process your personal information on our instructions and where they have agreed to treat the information confidentially and to keep it secure.
- 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.
- 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?

We will only retain your personal information for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements. Different laws require us to keep different data for different periods of time and we will process your personal data and sensitive personal data in line with the relevant legal requirement.

In some circumstances we may anonymise your personal information so that it can no longer be associated with you, in which case we may use such information without further notice to you.

Rights of access, correction, erasure, and restriction

Your duty to inform us of changes

It is important that the personal information we hold about you is accurate and current. Please keep us informed if your personal information changes during the recruitment process.

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 the DPO at "dpo@karianandbox.com"

No fee usually required

You will not have to pay a fee to access your personal information (or to exercise any of the other rights). However, we may charge a reasonable fee if your request for access is clearly unfounded or excessive. Alternatively, we may refuse to comply with the request in such circumstances.

What we may need from you

We may need to request specific information from you to help us confirm your identity and ensure your right to access the information (or to exercise any of your other rights). This is another appropriate security measure to ensure that personal information is not disclosed to any person who has no right to receive it.

Right to withdraw consent

In the limited circumstances where you may have provided your consent to the collection, processing and transfer of your personal information for a specific purpose, you have the right to withdraw your consent for that specific processing

at any time. To withdraw your consent, please contact the DPO at “dpo@karianandbox.com”. Once we have received notification that you have withdrawn your consent, we will no longer process your information for the purpose or purposes you originally agreed to, unless we have another legitimate basis for doing so in law.

Data Protection Officer

We have appointed a Data Protection Officer (DPO) 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 DPO at “dpo@karianandbox.com”. 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.