Recruitment – Job Applicant Privacy Policy

Lebus Upholstery Limited (**"the Company**") is committed to protecting the privacy and security of your personal information.

This privacy notice describes how we collect and use personal information about you as a job applicant, in accordance with the Data Protection Act 1998.

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.

The Company is 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.

It is important that you read and retain this notice, together with any other privacy notice we may provide on specific occasions when we are collecting or processing personal information about you, so that you are aware of how and why we are using such information and what your rights are under the data protection legislation.

We will only hold Personal Data on you for as long as necessary for the purposes for which we collected it.

Your Personal Data might be provided to us by you, or someone else (such as a former employer, your doctor, or a credit reference agency), or it could be created by us. It could be provided or created during the recruitment process.

"**Personal Data**" means information which relates to a living person who can be identified from that data (a **"Data Subject"**) on its own, or when taken together with other information which is likely to come into our possession. It includes any expression of opinion about the person and an indication of the intentions of us or others, in respect of that person. It does not include anonymised data. This applies whether it is stored electronically, on paper or on other materials.

"Sensitive Personal Data" means information revealing racial or ethnic origin, political opinions, religious or similar beliefs, trade union membership, physical or mental health conditions, sexual life, sexual orientation, biometric or genetic data, and Personal Data relating to criminal offences and convictions.

INFORMATION OFFICER

The Company has appointed the following person as the Company's Information Officer:

Lisa Burrows
lisaburrows@lebus.co.uk

The Information Officer is responsible for overseeing this policy. Please contact the Information Officer with any questions about the operation of this policy or the Data Protection Act 2018 or if you have any concerns that this policy is not being or has not been followed. If the Information Officer is not available, please contact a Director.

DATA PROTECTION PRINCIPLES

We will comply with data protection law. This says that the personal information we hold about you must be:

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

THE TYPES OF INFORMATION WE WILL HOLD ON 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, such as information about a person's health or sexual orientation.

We will collect and use the following types of Personal Data about you as a :

- recruitment information such as your application form and CV, any cover letter, references, qualifications and membership of any professional bodies, right to work documentation, and details of any pre-employment assessments;
- your contact details (name, title, address, telephone number, email address) and date of birth;
- interview notes and information provided to us by you in your interview

We collect personal information about you through the application and recruitment process, either directly from candidates or sometimes from an employment agency or background check provider. We may sometimes collect additional information from third parties including former employers, credit reference agencies or other background check agencies.

HOW WILL WE PROCESS YOUR PERSONAL DATA?

The Company will process your Personal Data (including Sensitive Personal Data) in accordance with our obligations under the UK Data Protection Legislation.

We will use your Personal Data for:

- complying with any legal obligation; or
- if it is necessary for our legitimate interests (or for the legitimate interests of someone else). However, we can only do this if your interests and rights do not override ours (or theirs). You have the right to challenge our legitimate interests and request that we stop this processing.

It is in our legitimate interests to decide whether to appoint you to since it would be beneficial to our business to appoint someone to the role that we are recruiting for.

We can process your Personal Data for these purposes without your knowledge or consent. We will not use your Personal Data for an unrelated purpose without telling you about it and the legal basis that we intend to rely on for processing it.

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.

EXAMPLES OF WHEN WE MIGHT PROCESS YOUR PERSONAL DATA

We have to process your Personal Data in various situations during the recruitment process.

For example:

- to decide whether to employ (or engage) you;
- to assess your skills, qualifications and suitability for employment;
- to communicate with you during the recruitment process;
- to keep records relating to the recruitment process;
- to comply with legal or regulatory requirement;
- to decide how much to pay you, and the other terms of your contract with us;
- to check you have the legal right to work for us;
- to carry out background and reference checks;
- to determine whether we need to make reasonable adjustments to your workplace or role because of your disability;
- to monitor diversity and equal opportunities;
- to defend the Company in respect of any investigation or litigation and to comply with any court or tribunal orders for disclosure;
- for any other reason which we may notify you of from time to time.

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

We will process information about you to decide whether you meet the basic requirements to be shortlisted for the role. If you do, we will decide whether your application is strong enough to invite you for an interview. If we decide to call you for an interview, we will use the information you provide to us at the interview to decide whether to offer you the role. If we decide to offer you the role, we will then take up references and (where applicable) carry out a criminal record and other relevant background checks before confirming your appointment.

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

- we will use information about your disability status to consider whether we need to provide appropriate adjustments during the recruitment process, for example whether adjustments need to be made during the recruitment process.
- we may use information about your race or national or ethnic origin, religious, philosophical or moral beliefs, or your sexual life or sexual orientation, to ensure meaningful equal opportunity monitoring and reporting.

INFORMATION ABOUT CRIMINAL CONVICTIONS

We will only collect information about criminal convictions if it is appropriate given the nature of the role and where we are legally able to do so. Where appropriate, we will collect information about criminal convictions as part of the recruitment process or we may be notified of such information directly by you in the course of you

working for us. We have in place appropriate safeguards which we are required by law to maintain when processing such data.

AUTOMATED DECISION-MAKING

You will not be subject to decisions that will have a significant impact on you based solely on automated decision-making.

DATA RETENTION

We will retain your personal information for a period of six months after we have communicated to you our decision about whether to appoint you. We retain your personal information for that period 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. After this period, we will securely destroy your personal information in accordance with applicable laws and regulations.

If we wish to retain your personal information on file, on the basis that a further opportunity may arise in future and we may wish to consider you for that, we will write to you separately, seeking your explicit consent to retain your personal information for a fixed period on that basis.

SHARING YOUR DATA

We will only share your personal information for the purposes of processing your application, for example with external recruitment advisers, your/our recruitment agency, former employers for reference purposes and relevant bodies for background checks.

We require those companies to keep your Personal Data confidential and secure and to protect it in accordance with the law and our policies. They are only permitted to process your Personal Data for the lawful purpose for which it has been shared and in accordance with our instructions.

We do not send your Personal Data outside the European Economic Area. If this changes you will be notified of this and the protections which are in place to protect the security of your data will be explained.

YOUR RIGHTS AS A DATA SUBJECT

Subject access request

As a data subject you can make a '**subject access request**' ('SAR') to find out the information we hold on you. This request must be made in writing to the Information Officer.
We must normally respond within thirty days unless your request is complex or numerous in which case the period in which we must respond can be extended by a further two months.
There is no fee for making a SAR. However, if the request is manifestly unfounded or excessive we may charge a reasonable administrative fee or refuse to respond to the request.

Correcting Personal Data

You can require us to correct any inaccuracies in your Personal Data. To do this in you should contact the Information Officer.

Erasure of Personal Data

You have the right to request that we erase your Personal Data where we were not entitled under the law to process it or it is no longer necessary to process it for the purpose it was collected. To do so you should contact the Information Officer.

Whilst you are requesting that your Personal Data is corrected or erased or are contesting the lawfulness of our processing, you can apply for its use to be restricted while the application is made.

Object to processing
You have the right to object to data processing where we are relying on a legitimate interest to do so and you think that your rights and interests outweigh our own and you wish us to stop.

You have the right to object if we process your Personal Data for the purposes of direct marketing.

Transfer of Personal Data
You have the right to receive a copy of your Personal Data and to transfer your Personal Data to another data controller. We will not charge for this and will in most cases aim to do this within one month.

Automated decision-making
With some exceptions, you have the right not to be subjected to automated decision-making.

Data Security Breach
You may have the right in certain circumstances to be notified of a data security breach concerning your Personal Data.

Consent
In most situations we will not rely on your consent as a lawful ground to process your data. If we do however request your consent to the processing of your Personal Data for a specific purpose, you have the right not to consent or to withdraw your consent later. To withdraw your consent, you should contact the Information Officer.

Right of complaint to the Information Commissioner
You have the right to complain to the Information Commissioner. You can do this be contacting the Information Commissioner's Office directly. Full contact details including a helpline number can be found on the Information Commissioner's Office website (www.ico.org.uk). This website has further information on your rights and our obligations.

CHANGES TO THIS PRIVACY NOTICE

We reserve the right to update this privacy notice.

If you have any questions about this privacy notice, please contact the Information Officer.

Signed on behalf of the Lebus Board of Directors by:

Lisa Burrows
Head of People
Lebus Upholstery Ltd.

Date: 20.11.26