



Recruitment Privacy Notice

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2. Policy Statement

Hyperoptic Ltd, registered at 200 Shepherds Bush Road, Hammersmith, London W6 7NL ("Hyperoptic", "we", "us", "our"), is a Data Controller under the definitions of the General Data Protection Regulation ((EU) 2016/679) ("GDPR") and Data Protection Act 2018.

This privacy notice applies to you if you are applying for work with us (whether as an employee, worker or contractor). As part of any recruitment process, we collect and process personal data relating to applicants. We are committed to being transparent about how and why we collect and use that data (namely for the purposes of the recruitment exercise) and to meeting our data protection obligations.

This privacy notice makes you aware of how and why your personal data will be used and for how long it will be retained. It also provides you with certain information that must be provided under the GDPR.

3. Our compliance with 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.

4. What information do we collect, how do we collect it and how long do we keep data for?

We may collect, store and use a range of information about you in connection with your application for work with us, including:

- Name, address and contact details (e.g. email address and telephone number).
- Details of qualifications, skills, experience and employment history and any other information you have provided to us in your curriculum vitae and covering letter.
- Information about 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.
- Declarations relating to criminal convictions.
- Information about your entitlement to work in the UK.
- Personality assessment for managerial roles.
- Any information you provide to us during an interview.

We collect this information about you from a number of sources, including:

- You, the applicant/candidate.
- Recruitment agencies.
- Credit reference agencies.
- Application forms.
- CVs and resumes which you have submitted directly to us or our agents.
- Passport and other identity documents.
- Interviews and other forms of assessment.
- Skills assessment tools that are part of the recruitment process.
- References supplied by former employers and other contacts provided by you.
- Background and criminal record check providers (if required).

In relation to formal applications, data will be stored on your application record, in HR management systems and on other IT systems (including email) required to manage the recruitment process.

If your application for employment is unsuccessful, we will hold your data on file for a period of 12 months after the end of the relevant recruitment process, for recruitment management purposes and as may be required for considering you for future employment. We will only



hold your data for contacting you about future employment opportunities if you have consented to us doing so.

5. Why do we process your personal data?

We need information about you (from you and other third-party sources mentioned above for the purpose of processing your application.

We need to process data to ensure the company complies with its legal obligations.

For example, we are required to check a successful applicant is eligible to work in the UK before employment starts.

We have a legitimate interest in processing personal data during the recruitment process and for keeping records of the process. Processing data from applicants allows us to manage the recruitment steps, assess and confirm a candidate is a suitable for us to engage and decide to whom to offer a role. We may also need to process data from applicants to respond to and defend against legal claims.

We process health information if we need to make reasonable adjustments to the recruitment process for candidates who have a disability. This is to carry out our legal obligations and exercise specific rights in relation to employment.

For some roles, we are obliged to find out whether a candidate has unspent criminal convictions and offences. When this applies, we do so because it is necessary for us to carry out our legal obligations and exercise specific rights in relation to employment or engagement with us.

6. Automated Decision Making and Profiling

Some of our recruitment processes may be based solely on automated decision making. This can include rejecting a candidate via automated electronic screening questions; this can be related to something critical that a candidate is legally required to hold in order to undertake the role and at the standard required for the role.

You have the right to challenge the automated decision and to request a person reviews and assesses the decision.



For most managerial roles Hyperoptic requires all selected candidates to undertake an online assessment (Robert Thomas International and Predictive Index) which is used as part of the interview process.

7. Who has access to data?

Your information will be shared internally during the recruitment stages. This includes members of the People and Talent Acquisition 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.

As part of the recruitment process your data will be stored on our secure HR systems and may be shared with third party providers who arrange testing, background or health checks as required.

If your application for employment or another form of engagement with the company is successful and we make you an offer we will contact former employers or clients whose details you provided to us to obtain references for you. We may also share data which identifies you, with organizations that provide personal background checks such as the Disclosure and Barring Service or other criminal records checking agencies to obtain necessary criminal records checks (we will always obtain your explicit permission to do a criminal record check).

8. Is your data transferred outside of the EEA?

Personal data may be transferred outside of the EEA to be processed by our Serbian office. These procedures are conducted on the basis of a written and legal agreement between the UK and Serbian branches of Hyperoptic (standard contract clauses) as required by GDPR.

9. How do we protect data?

We take the security of your data seriously. We have 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 staff on a strict 'need to know' basis in the proper performance of their duties.

10. Your Rights

As a data subject, you have the right to:



- Be informed about the collection and use of your data
- Access and obtain a copy of your data on request.
- Object to the processing of your data where we are relying on its legitimate interests as the legal ground for processing.
- receive your data in a structured, commonly used and machine-readable format and transmit it to another controller without hindrance from us.
- Ask us to stop processing data for a period if data is inaccurate or there is a dispute about whether or not your interests override our legitimate grounds for processing data.
- request the restriction or suppression of your data in certain circumstances
- Change incorrect or incomplete data.
- Request to delete or stop processing your data, for example where the data is no longer necessary for the purposes of processing.

For further information, or if you would like to exercise any of these rights please contact us by email at: dataprotection@hyperoptic.com.

11. What if you do not provide personal data?

Personal Information requested in our recruitment process is necessary to process your application effectively and fairly in relation to your and other applicants.

Certain information, such as proof of your right to work in the UK are mandatory by law and your application is dependent on you providing this information.

12. How to complain

You can contact our Compliance Team at dataprotection@hyperoptic.com.

If you believe we have not complied with your data protection rights, you can complain to the Information Commissioner's Office via <https://ico.org.uk/> or phone 0303 123 1113.