



Privacy Notice: Applicants

Effective date: March 2024

1 Introduction

This Privacy Notice applies to all job applicants for the Graduate & Internship Programme at Belron. This notice describes how Belron, as a data controller, collects, uses, shares, and retains the personal information you provide and informs you about your choices regarding use, access and correction of your personal information. Belron is committed to ensuring that any personal data it receives is protected and handled in accordance with applicable data protection laws including the Data Protection Act 2018 (UK), the UK GDPR (as defined in the Data Protection Act 2018) ("UK GDPR") and the General Data Protection Regulation 2016/679 (EU) ("GDPR").

For the purposes of this Privacy Notice, references to "we", "us" or "our" shall refer to Belron.

2 Who we are

Belron International Limited ("Belron") is a company incorporated in England and Wales whose principal place of business is Milton Park, Stroude Road, Egham, TW20 9EL.

Amberjack Global Ltd, acting as our data processor, provides us with recruitment services including the use of their platform called "Ambertrack" and supports us with certain recruitment activities.

3 What personal information we process about you

"Personal data" means any information relating to you. Belron will collect and use the following categories and types of personal data about you, which we call **Applicant Data**:

- **Personal Contact Information** including physical home address, personal phone and mobile numbers, personal email addresses and personal social media identifiers.
- **Recruitment data** including CV, educational level, exam results and grades, educational degree/date of graduation, certificate/license number, backgrounds checks and associated cover letters and correspondence, interviews and assessments data, psychometric tests data, data related to reviews, survey responses and comments/ feedbacks.
- **Personal details** including name, date and place of birth, nationality, geographic location, entitlement to work in a given jurisdiction and copies of right to work documentation, family situation/marital status, children, , copy of the identity card/passport, social security number, driver's license number, citizenship information, ID card/passport number, visa information, port of entry, state or federal ID number, military status, other government issued ID number, membership information, medical or health conditions/PHI (Protected Health Information), communications contents, opinions and preferences (expressed by an individual or about an individual), images and video.

In addition to the collection, processing and use of the Applicant Data, Belron collects and uses the following special categories of personal information about you which we call "**Sensitive Applicant Data**":

- racial or ethnic origin;
- health/disability;
- sex life or sexual orientation.

4 Why we collect your personal information and the lawful basis for processing

We collect and use Applicant Data and Sensitive Applicant Data for a variety of reasons linked to processing your application for a role with us (the "**Processing Purposes**"). However, we can only collect and use this data if we have a valid lawful basis for doing so, and we are required to explain the various lawful bases that we rely on to you.

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we use your information. Please contact us if you need details about the specific legal ground we are relying on to process your personal information where more than one ground has been set out in the table below.

Below are the Processing Purposes and corresponding Legal Basis for **Applicant Data**:

Processing Purposes	Legal Basis
<p>1. Recruitment Process Management that includes:</p> <ul style="list-style-type: none"> a) Administering and processing your application (including processing a job offer should you be successful) b) Determining your eligibility for the role you applied for c) Conducting background checks as part of your application. 	<ul style="list-style-type: none"> • Necessary for performing a contract with you as the data subject; • Compliance with legal obligations <p>Legitimate interests of Belron</p>
<p>2. Communicating with you, Belron employees and third parties, including informing you of future opportunities with Belron.</p>	<ul style="list-style-type: none"> • Legitimate interests of Belron.

Below are the Processing Purposes and corresponding Legal Basis for **Sensitive Applicant Data**:

Processing Purpose	Legal Basis
<p>1. To accommodate your application and interview and for compliance with legal obligations, we may use health and medical data.</p>	<ul style="list-style-type: none"> • Your explicit consent as allowed by local data protection law; and • Necessary to carry out the obligations and to exercise specific rights of Belron or you in the field of employment and social security and social protection law as permitted by local data protection law.

2. Equal opportunities monitoring and diversity monitoring and initiatives

- Your explicit consent as allowed by local data protection law.

When we rely on legitimate interests as one of legal grounds to process your data, this may include:

- Assessing your suitability for employment/engagement with Belron;
- Prevention of fraud, misuse of company IT systems, or money laundering;
- Physical security, IT and network security;

When relying on the legitimate interests basis for processing your personal data, we will balance the legitimate interest pursued by us and any relevant third party with your interest and fundamental rights and freedoms in relation to the protection of your personal data to ensure it is appropriate for us to rely on legitimate interests and to identify any additional steps we need to take to achieve the right balance.

5 Who we are sharing your data with

- **Belron Overseas Offices.** As Belron is part of a wider group with offices located across the globe, which all partially share management, human resources, legal, compliance, finance and audit responsibility, Belron may transfer the Applicant Data and Sensitive Applicant Data to, or otherwise allow access to such data by other entities within Belron.
- **Regulators, authorities, and other third parties.** As necessary for the Processing Purposes described above, personal information may be transferred to regulators, courts, and other authorities (e.g., tax and law enforcement authorities), independent external advisors (e.g., auditors, law firms), insurance providers, pensions and benefits providers, internal compliance and investigation teams (including external advisers appointed to conduct internal investigations).
- **Data processors.** Amberjack Global Ltd acts as a data processor on behalf of Belron. All activities carried out by Amberjack are subject to contractual obligations or instructions provided by us.

6 How long we keep your data

If you are unsuccessful in your application, we will keep your details for twelve months from the final recruitment decision. After that date, your data will be anonymized for statistical purposes.

If you are successful in your application, we will keep your Application Data for two years from the end of your employment with us.

Your Sensitive Personal Data will be aggregated at the point of collection.

7 International transfers

All your personal data will be processed within the UK.

8 Your rights

You have certain rights as an individual which you can exercise in relation to the information we hold about you. If you make a request to exercise any of your rights we reserve the right to ask you for a proof of your identity. We aim to acknowledge your request as soon as possible.

You have the following rights:

The right to access

You are entitled to a confirmation whether we are processing your data, a copy of your data, and information about purposes of processing, who do we disclose it to, whether we transfer it abroad and how we protect it, how long we keep it for, what rights you have, where we got your data from and how you can make a complaint.

The right to rectification

If you believe the personal information we hold about you is inaccurate or incomplete you can request for it to be rectified.

The right to erasure

If you withdraw your consent, terminate a contract with us or you believe the personal information is no longer necessary for the purposes for which it was collected, you may request your data to be deleted. However, this will need to be balanced against other factors, for example there may be certain regulatory obligations which mean we cannot comply with your request.

The right to restriction of processing

You can ask us to restrict (i.e. keep but not use) your personal data, but only where:

- Its accuracy is contested, to allow us to verify its accuracy; or
- The processing is unlawful, but you do not want it erased; or
- It is no longer needed for the purposes for which it was collected, but we still need it to establish, exercise or defend legal claims; or
- You have exercised the right to object, and verification of overriding grounds is pending.

We can continue to use your personal data following a request for restriction, where we have your consent; to establish, exercise or defend legal claims; or to protect the rights of another natural or legal person.

The right to data portability

If we collected your information under a contract or your consent, you can request from us to transfer your personal information to provide it to another third party of your choice.

The right to object

You have the right to object at any time to processing of your personal data where the processing is necessary for the purposes of the legitimate interests, except where such interests are overridden by your interests or fundamental rights and freedoms.

The right to withdraw consent

If we process your personal information under your consent, you can withdraw it any time.

9 Contact details

If you have any questions relating to this notice or use of your personal information in the recruitment process, please contact our Privacy Officer:

Email: privacy@belron.com

10 Complaints

If you are not satisfied with our response or believe we are not processing your personal data in accordance with legal requirements you can make a complaint to the [Information Commissioner's Office](#).

