

## Data Privacy Statement

### Applicant Privacy Notice

IMI plc is a “data controller”. This means that we are responsible for deciding how we hold and use personal information about you. You are being sent a copy of this privacy notice because you are applying for work with us. 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. It provides you with certain information that must be provided under the General Data Protection Regulation ((EU) 2016/679) (GDPR).

### Data Controller Details

**IMI plc** is the data controller. Our registered office address is:

IMI plc  
Lakeside  
Solihull Parkway  
Birmingham Business Park  
Birmingham  
B37 7XZ  
Data Protection Principles

In relation to your personal data, we will:

- Use it fairly, lawfully and in a clear, transparent way;
- Collect it only for reasons that we have clearly explained to you;
- Only use it in the way that we have told you about;
- Ensure that it is correct and up to date;
- Keep your data only for as long as we need it; and
- Keep it secure.

### Types of Data We Collect

Relating to your application for a role in **IMI**, we need to collect data about you so that we can assess your suitability for the role. This data will include your name, email address and phone number(s). We may also ask you to provide your employment history, education history and to upload your CV.

As part of the application form, we ask to collect a range of information which may include special categories of data. If requested, this data is requested from you to help us understand application patterns. In all cases, there is an option of ‘Prefer not to say’ or similar.

The special categories that you may be asked for during the application process might include:

- Disability
- National or ethnic origin

We will use special category data only for the following reasons:

- To ensure meaningful equal opportunity monitoring and reporting
- To consider whether we need to provide appropriate adjustments for disabled applicants during a recruitment process
- To carry out our legal obligations and exercise specific rights in relation to employment

In this application we may also ask for you to provide the following sets of personal data. Again, there is a 'Prefer not to say' option if you decide you don't wish to provide this.

- Your gender
- Whether or not you have a disability

In some circumstances, decisions will be made about your application in a pre-defined way. These are known commonly as 'pre-screen questions'. These will relate to mandatory requirements or your suitability for the role. In these circumstances, your response(s) are used to produce an outcome on the application. In no way is your personal information used to make such decisions, and in no way is any data from Special Categories used in this way. No profiling of any type is carried out.

If you are successful in reaching interview and / or assessment centre, you will be asked to provide documentary evidence relating to your right to work in the country you are applying for and a proof of address. This is likely to be in the form of a driving licence or passport, and a utility bill.

#### **Legal basis - why we wish to use your data**

The legal basis for collecting your data is our legitimate interest in successfully processing your application for the job(s) in question, and to keep appropriate records of that process.

#### **Deciding not to provide data to us**

We do need this data to allow us to carry out an effective recruitment process. Whilst you are under no obligation to provide us with your data, we may not be able to process your application if you decide not to provide the data being requested.

#### **How We Collect Your Data**

The data is collected using a system called Ambertrack, which is provided by Amberjack Global Limited who act as a data processor for us.

#### **Sharing your data**

Your data will be used by our partner amberjack, and also shared with colleagues within IMI where it is necessary for them to undertake their duties relating to the recruitment process.

Where necessary, and for the explicit purpose of processing your application for the job, we may transmit your data to a 3rd party software provider (e.g. online test provider or video interview provider).

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 and relevant data protection legislation. 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.

If your application for employment is successful and we make you a provisional offer of employment, we will at that point then share some of your data (but no special category data) with former employers to obtain references and/or employment background check providers to obtain necessary background check. In all circumstances, your data will only be used for the express purpose of processing your application for the job in question.

We may also, from time to time, need to transfer your data to other entities in the IMI group located outside the European Economic Area (“EEA”). When this occurs, it is carried out using the appropriate legal mechanisms and protections in accordance with data protection legislation.

### **Protecting your data**

We take the security of your data seriously. We have internal policies, appropriate security measures and controls in place to ensure that your data is not lost, accidentally destroyed, misused or disclosed, and is not accessed except by our employees in the proper performance of their duties.

### **How long we keep your data for**

In line with data protection principles, we only keep your data for as long as we need it for and this will depend on whether or not you are successful in obtaining employment with us.

If your application is not successful we will keep your data for a period of **24 months** once the recruitment exercise ends. If your application is successful, your data will be kept and transferred to the systems we administer for employees and retained in accordance with our Employee Privacy Notice. If successful, you will be informed how to access the Employee Privacy Notice to ensure you remain informed of how your data is to be used.

### **Your rights in relation to your data**

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.
- **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 wish to exercise any of the rights explained above please contact:

Liz Rose  
liz.rose@imiplc.com

#### Making a Complaint

The supervisory authority in the UK for data protection matters is the Information Commissioner (ICO). If you think your data protection rights have been breached in any way by us, you are able to make a complaint to the ICO ([www.ico.org.uk](http://www.ico.org.uk)).