

IPL Group

Job Candidate Privacy Notice (Québec)

Thank you for your application for a position with the IPL Group.

The IPL Group takes its responsibilities under applicable data protection law, including the *Act respecting the protection of personal information in the private sector*, c. P-39.1 (“**Act**”) very seriously.

This Privacy Notice relates to our collection and use of your personal information when you apply for positions, or otherwise correspond with us in respect of career opportunities, in any companies within the IPL Group (“**we**”, “**us**”, “**our**”). This Privacy Notice is intended to confirm the rights of candidates and potential candidates and the obligations of IPL Group when communicating with or applying to roles for an IPL Group company which is established in Québec, such as IPL North America Inc. and IPL Plastic Inc.

By providing personal information to us, you agree to the processing set out in this Privacy Notice as well as authorize us to process your personal information for purposes set out below.

Purposes of data collection and use

When you apply for, or contact us with queries about, a position with the IPL Group, we will collect and gather information for the following purposes:

- To consider a candidate for a position with the IPL Group and if successful, to make an offer of employment;
- To assess a candidate’s skills qualification and suitability for work;
- To carry out background, reference and criminal conviction history checks, where applicable;
- To check a candidate’s eligibility to work in the relevant country for the role;
- To outsource services to third party service providers;
- To respond to queries and/or make contact with you
- To keep records related to our hiring processes;
- To adapt our recruitment process where adjustments need to be made to accommodate a candidate’s disability;
- To ensure meaningful equal opportunities monitoring and reporting.

It is in our legitimate interests to decide whether to appoint you to work since it would be beneficial to our business to appoint someone to that work.

Having received your CV and covering letter or your application form and the results from any test if applicable we will then process that information 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 work. If we decide to offer you the work, we will then take up references and / or carry out a criminal record before confirming your appointment.

Information We Collect

When you apply for a position with the IPL Group, we will collect and gather the following categories of information:

- **Identity Data** such as first name, surname, gender, date of birth.
- **Contact Data** such as address, e-mail address, telephone number.

- **Profile Data** such as information contained in resumes/CVs and cover letters, the sensitive data listed in this notice, applications employment details, education history, eligibility to work and salary expectations, any information you provide to us during an interview, results of any tests, suitability checks for any role.

The type of personal data collected and used by us varies depending upon whether you are applying for a position or just making an inquiry. It is within your control what information you provide to us on any application and if you do not want us to process information then you should not include this on the documents mentioned above. However, if you apply for a position with the IPL Group, it is your responsibility to provide us with an application that is complete and accurate in order to allow us to give your candidacy due consideration. Submitting false, incorrect or incomplete information could bring us to reject your application.

In circumstances where you provide us with the names and other contact details of referees, we may receive personal information about you from such third parties if we reach out to them in connection with your application for a position with us.

Sensitive Information

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

- Information about your race or ethnicity, religious beliefs, sexual orientation and political opinions to ensure meaningful equal opportunity monitoring and reporting;
- Information about criminal convictions and offences, in order to satisfy ourselves that there is nothing in your criminal convictions history which makes you unsuitable for the role.

Data Sharing & Security

We will only share your personal information with third parties for the purposes of processing your application. 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.

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.

Third party Recipients-recipients of data

We may disclose any of your personal data detailed above to third party recipients in connection with the above purposes, including:

- to third parties who we engage to provide services or benefits to us or to you, such as professional advisers, auditors, insurers and outsourced IT and other service providers (including to Clear Company, which provides the IPL Group with a global applicant tracking system);

- to companies within the IPL Group, where necessary and relevant in connection with your application for a position or to deal with a query you have raised;
- to referees that you have identified to us in order for us to seek references from such referees.

~~Transfers Abroad~~Communication outside of Québec

- In connection with the above processing activities, we may transfer your personal information outside Québec to (i) IPL Group companies or (ii) service providers which provide services to the IPL Group.
- In such circumstances, we ensure that appropriate measures are in place in respect of such transfers. One such measure is entering into a contract governing the transfer which contains the 'standard contractual clauses' ~~approved for this purpose by the European Commission~~compliant with our legal obligations.
- As above, the IPL Group uses Clear Company for global applicant tracking. Clear Company are based in the United States of America. Their privacy information is at this link: [View Our Privacy Policy | ClearCompany](#) and [Privacy Shield Policy \(clearcompany.com\)](#). Clear Company use sub-processors all of whom are based in the United States of America. If you engage with us via ClearCompany they will provide you with necessary privacy information. A list of sub-processors can be made available on request. You can seek to apply with IPL Group not using ClearCompany if you do not wish for your data to be processed in the manner described above. This will not affect your application.
- If you would like further details of the measures that the IPL Group has taken in this regard, please contact us at Mitch.Darling@iplglobal.com.

Necessity of provision of certain information and consequences

You are under no statutory or contractual obligation to provide data to us during the recruitment process. However, if you do not provide the information, we may not be able to process your application properly or at all (e.g. where you fail to provide information on your entitlement to work in a certain country), which could result in the rejection of your application.

Your Rights

You have the following rights, in certain circumstances and subject to certain restrictions, in relation to your personal data:

- **Right to access the data** – You have the right to request a copy of the personal data that we hold about you, together with other information about our processing of that personal data.
- **Right to rectification** – You have the right to request that any inaccurate data that is held about you is corrected, or if we have incomplete information you may request that we update the information such that it is complete.
- **Withdrawal of consent** – Where our processing of your personal data is based on you having provided your consent, you have the right to withdraw your consent at any time.

If you wish to exercise any of the rights set out above, please contact us at Mitch.Darling@iplglobal.com.

Questions and Complaints

If you have any questions or complaints about our use of your personal data, please contact us at Mitch.Darling@iplglobal.com.