

## **IPL Group**

### **Job Candidate Privacy Notice (UK and EEA)**

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 General Data Protection Regulation and implementing legislation ("**Data Protection Law**") 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 the obligations of IPL Group when applying to roles within the EU, EEA and the UK. This notice is split into two parts Part A relates to those roles in the EEA (including the EU) and Part B relates to those roles in the UK.

IPL Group are the 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 (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. It provides you with certain information that must be provided under the General Data Protection Regulation ((EU) 2016/679) (GDPR) and the retained UK version for the GDPR termed below as the UK GDPR.

#### **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.

#### **PART A - EEA**

Part A of this Privacy Notice applies where you apply for, or contact us with queries about, a position in an IPL Group company which is established within the European Union (EU) or European Economic Area (EEA), such as One51 Group Services Limited or another IPL entity within EEA. In such circumstances, the relevant IPL Group company to whom you are applying for a position or raising a query will be the relevant controller of personal data processed in connection with such application or query.

#### **Information We Collect**

## 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.

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.
- Information about your health, including any medical condition, health and sickness records.
- Information about criminal convictions and offences.

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 a test or interview;
- We will 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.

We envisage that we will process information about criminal convictions.

We will collect information about your criminal convictions history if we would like to offer you the work (conditional on checks and any other conditions, such as references, being satisfactory). We will only carry out checks for roles which would require this and will only carry out a criminal records check in order to satisfy ourselves that there is nothing in your criminal convictions history which makes you unsuitable for the role. In particular:

- Where are legally required to carry out criminal record checks for those carrying out a certain type of work,
- Where the role is one which is listed on the Rehabilitation of Offenders Act 1974 (Exceptions) Order 1975 (SI 1975/1023)] or the Police Act 1997 (Criminal Records) Regulations (SI 2002/233)
- Where the role requires a high degree of trust and integrity and so we would like to ask you to seek a basic disclosure of your criminal records history.

### Legal Bases for Processing Personal Data

The personal data described above is used by us and third party service providers acting on our behalf, as set out in further detail below. The legal bases on which we collect, process and transfer your personal data for these purposes are:

- where such processing is necessary for our legitimate interests in conducting our business in a responsible and commercially prudent manner;
- to comply with our legal and regulatory obligations;
- where such processing is necessary for the performance of a contract with you or where it is necessary to take steps at your request prior to entering into a contract with you; and
- in certain limited circumstances, your consent (where this is the case you will be asked to give a positive indication of that consent).

Where we have listed legitimate interests as a legal basis for processing, we will not process your personal data for these purposes if our or the third party's legitimate interests should be overridden by your own interests or fundamental rights and freedoms.

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

### Processing activities and associated legal bases

We set out below details on the general purposes for which we use your personal data, the categories of personal data relevant to those purposes and the related legal basis (or bases, if more than one applies) under Data Protection Law for processing such personal data.

Purpose	Categories of personal data	Legal bases
To consider you for a position with the IPL Group, and if successful, to make you an offer of employment.	Identity data Contact Data Profile Data	To take steps at your request prior to potentially entering into an employment contract with you.  Our legitimate interests in conducting our business in a responsible and commercially prudent manner.

To assess your skills qualification and suitability for work.	Identity data Contact Data Profile Data	To take steps at your request prior to potentially entering into an employment contract with you.  Our legitimate interests in conducting our business in a responsible and commercially prudent manner.
Carry out background and reference checks, where applicable	Identity Data Contact Data Profile Data	To take steps at your request prior to potentially entering into an employment contract with you.  Our legitimate interests in conducting our business in a responsible and commercially prudent manner.  To comply with our legal obligations.
To check your eligibility to work in the relevant country	Identity Data Contact Data Profile Data	To comply with our legal obligations.
To outsource services to third party service providers	Identity data Contact Data Profile Data	Our legitimate interests in conducting our business in a responsible and commercially prudent manner
To respond to queries and / or make contact with you.	Identity Data Contact data Profile Data  Any other details which you provide to us in connection with your query not captured within the above.	To take steps at your request prior to potentially entering into an employment contract with you  Our legitimate interests in conducting our business in a responsible and commercially prudent manner
Keep records related to our hiring processes	Identity data Contact Data Profile Data	To comply with our legal obligations.

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.

We also need to process your personal information to decide whether to enter into a contract of employment with you.

Having received your CV and covering letter or your application form and the results from any test 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.

### **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.

### ***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 competent government, regulatory and law enforcement authorities and other similar bodies as requested or required by law;
- 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***

- In connection with the above processing activities, we may transfer your personal information outside the European Economic Area 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.
- 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](mailto:Mitch.Darling@iplglobal.com).

## **Retention**

If you apply for a position and are subsequently employed by the IPL Group, we will retain your personal information in accordance with the retention times set out in our employee privacy policy and employee handbook.

Otherwise, we retain your personal information for a period of no more than twelve months after the relevant job application process has concluded. If you withdraw your application, we will delete your personal information unless we are required to keep your personal information for a longer period in order to comply with our obligations under applicable law.

We retain your personal information for the periods specified 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. In the event of a claim your data may be stored for a longer period than the 12 months in order to satisfy the purposes of the litigation. After this period, we will securely destroy your personal information in accordance with our data retention policy.

If you have indicated that you would like to be considered for future roles with the IPL Group, we will retain your personal information for that purpose for 1 year from the date on which you indicate your interest.

## **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).

## **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.
- **Right to erasure** – You have the right to request us to delete personal data that we hold about you. This is sometimes referred to as the right to be forgotten.
- **Right to restriction of processing or to object to processing** – You have the right to request that we no longer process your personal data for particular purposes, or to object to our processing of your personal data for particular purposes.
- **Right to data portability** – You have the right to request us to provide you, or a third party, with a copy of your personal data in a structured, commonly used machine readable format.
- **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.

Please note that these rights are not absolute, and are subject to certain restrictions and exemptions. For example, the right to erasure of personal data will not apply where we have a legitimate reason to continue to hold such data and we may continue to process your personal data, despite an objection by you, where we have compelling legitimate grounds for the processing which override your interests, rights and freedoms.

If you wish to exercise any of the rights set out above, please contact us at [Mitch.Darling@iplglobal.com](mailto: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](mailto:Mitch.Darling@iplglobal.com).

You also have the right to lodge a complaint with your EU Member State's data protection supervisory authority if you are not happy with the way we have used your information or addressed your rights. For a list of these authorities and their contact details, please visit [https://edpb.europa.eu/about-edpb/about-edpb/members\\_en](https://edpb.europa.eu/about-edpb/about-edpb/members_en)

## PART B - UK

Part B of this Privacy Notice applies where you apply for, or contact us with queries about, a position in an IPL Group company which is established within the UK, such as One51 ES Plastics UK Limited or another entity in the IPL Group in the UK. In such circumstances, the relevant IPL Group company to whom you are applying for a position or raising a query will be the relevant controller of personal data processed in connection with such application or query. The UK's primary legislation on data protection is the retained UK version of the GDPR termed as the UK GDPR and the Data Protection Act 2018.

### 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.

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.
- Information about your health, including any medical condition, health and sickness records.
- Information about criminal convictions and offences.

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 a test or interview;
- We will 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.

We envisage that we will process information about criminal convictions.

We will collect information about your criminal convictions history if we would like to offer you the work (conditional on checks and any other conditions, such as references, being satisfactory). We will only carry out checks for roles which would require this and will only carry out a criminal records check in order to satisfy ourselves that there is nothing in your criminal convictions history which makes you unsuitable for the role. In particular:

- Where are legally required to carry out criminal record checks for those carrying out a certain type of work,
- Where the role is one which is listed on the Rehabilitation of Offenders Act 1974 (Exceptions) Order 1975 (SI 1975/1023)] or the Police Act 1997 (Criminal Records) Regulations (SI 2002/233)



- Where the role requires a high degree of trust and integrity and so we would like to ask you to seek a basic disclosure of your criminal records history.

### Legal Bases for Processing Personal Data

The personal data described above is used by us and third party service providers acting on our behalf, as set out in further detail below. The legal bases on which we collect, process and transfer your personal data for these purposes are:

- where such processing is necessary for our legitimate interests in conducting our business in a responsible and commercially prudent manner;
- to comply with our legal and regulatory obligations;
- where such processing is necessary for the performance of a contract with you or where it is necessary to take steps at your request prior to entering into a contract with you; and
- in certain limited circumstances, your consent (where this is the case you will be asked to give a positive indication of that consent).

Where we have listed legitimate interests as a legal basis for processing, we will not process your personal data for these purposes if our or the third party's legitimate interests should be overridden by your own interests or fundamental rights and freedoms.

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

### Processing activities and associated legal bases

We set out below details on the general purposes for which we use your personal data, the categories of personal data relevant to those purposes and the related legal basis (or bases, if more than one applies) under Data Protection Law for processing such personal data.

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To assess your skills qualification and suitability for work.	Identity data Contact Data Profile Data	To take steps at your request prior to potentially entering into an employment contract with you.  Our legitimate interests in conducting our business in a responsible and commercially prudent manner.

Carry out background and reference checks, where applicable	Identity Data Contact Data Profile Data	To take steps at your request prior to potentially entering into an employment contract with you.  Our legitimate interests in conducting our business in a responsible and commercially prudent manner.  To comply with our legal obligations.
To check your eligibility to work in the relevant country	Identity Data Contact Data Profile Data	To comply with our legal obligations.
To outsource services to third party service providers	Identity data Contact Data Profile Data	Our legitimate interests in conducting our business in a responsible and commercially prudent manner
To respond to queries and / or make contact with you.	Identity Data Contact data Profile Data  Any other details which you provide to us in connection with your query not captured within the above.	To take steps at your request prior to potentially entering into an employment contract with you  Our legitimate interests in conducting our business in a responsible and commercially prudent manner
Keep records related to our hiring processes	Identity data Contact Data Profile Data	To comply with our legal obligations.

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.

We also need to process your personal information to decide whether to enter into a contract of employment with you.

Having received your CV and covering letter or your application form and the results from any test 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.

### **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.

### ***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 competent government, regulatory and law enforcement authorities and other similar bodies as requested or required by law;
- 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***

- In connection with the above processing activities, we may transfer your personal information outside the UK to (i) IPL Group companies in the UK or EU 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 follows the terms of an International Data Transfer Agreement prescribed by the Information Commissioners Office.

- 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](mailto:Mitch.Darling@iplglobal.com).

## Retention

If you apply for a position and are subsequently employed by the IPL Group, we will retain your personal information in accordance with the retention times set out in our employee privacy policy and employee handbook.

Otherwise, we retain your personal information for a period of no more than twelve months after the relevant job application process has concluded. If you withdraw your application, we will delete your personal information unless we are required to keep your personal information for a longer period in order to comply with our obligations under applicable law.

We retain your personal information for the periods specified 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. In the event of a claim your data may be stored for a longer period than the 12 months in order to satisfy the purposes of the litigation. After this period, we will securely destroy your personal information in accordance with our data retention policy.

If you have indicated that you would like to be considered for future roles with the IPL Group, we will retain your personal information for that purpose for 1 year from the date on which you indicate your interest.

## 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).

## 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.
- **Right to erasure** – You have the right to request us to delete personal data that we hold about you. This is sometimes referred to as the right to be forgotten.

- **Right to restriction of processing or to object to processing** – You have the right to request that we no longer process your personal data for particular purposes, or to object to our processing of your personal data for particular purposes.
- **Right to data portability** – You have the right to request us to provide you, or a third party, with a copy of your personal data in a structured, commonly used machine readable format.
- **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.

Please note that these rights are not absolute, and are subject to certain restrictions and exemptions. For example, the right to erasure of personal data will not apply where we have a legitimate reason to continue to hold such data and we may continue to process your personal data, despite an objection by you, where we have compelling legitimate grounds for the processing which override your interests, rights and freedoms.

If you wish to exercise any of the rights set out above, please contact us at [Mitch.Darling@iplglobal.com](mailto: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](mailto:Mitch.Darling@iplglobal.com).

You also have the right to lodge a complaint with the Information Commissioners Office if you are not happy with the way we have used your information or addressed your rights. Details of how to do this can be found at this link: [Make a complaint | ICO](#)