

## **APPLICANTS PRIVACY NOTICE**

### **1. Introduction**

- 1.1 This privacy notice describes how we (CDP Worldwide) collect and use personal information we receive from you during the recruitment process and applies to all applicants.
- 1.2 CDP Worldwide is a “data controller”, references to ‘we’ or ‘us’ mean CDP Worldwide and our group companies namely CDP Worldwide, CDP Operations Limited, CDP Worldwide (Europe) gGmbH, CDP Europe -Services GmbH, CDP Worldwide Services GmbH, CDP North America, CDP Worldwide-Japan, Beijing Carbon Disclosure Project Environmental Consulting Co, Carbon Disclosure Project India, Carbon Disclosure Project Latin America and CDP World (Hong Kong) Limited, (our ‘group companies’) and in this notice we are responsible for deciding how we hold and use your data. We are required under data protection legislation to notify you of this under this privacy notice.
- 1.3 As part of our recruitment process, we collect and process personal information from applicants.
- 1.4 Your privacy and the handling of your confidential information is important to us. This privacy notice describes how we will use your personal information when you apply for a role with us.

### **2. Personal Information**

- 2.1 To manage your application, we need to process certain personal information about you. We only process your personal data necessary for the purposes of progressing your application or as required by law or regulatory requirements.
- 2.2 The personal information we collect will include:
  - 2.2.1 your name, address and proof of your address
  - 2.2.2 your contact details, including email address and telephone number;
  - 2.2.3 details of your qualifications, skills, experience and employment history;
  - 2.2.4 your entitlement to work in the country where the role is based; and
  - 2.2.5 details of your referees.

### **3. How we collect the information**

- 3.1 We may collect this data in a variety of ways. For example, it might be contained in CVs, obtained from your passport or other identity documents, or collected through interviews. or other forms of assessment.
- 3.2 We may also collect data about you in the form of references supplied by former employers. We will seek such data once an offer has been made and your consent has been obtained.

3.3 Your data will be stored in your personnel file, the HR personal data system, and our secure IT systems.

#### **4. Use of your personal information**

4.1 The personal information we obtain in relation to your application will be used by us to consider your suitability for the role.

4.2 We need to process your data to ensure we comply with our legal obligations. For example, we are required to check a successful applicant's eligibility to work in the country where the job is based before employment starts.

4.3 We will not use your data for any purpose other than the recruitment exercise for which you have applied.

#### **5. Why we collect the information and how we use it**

5.1 We will typically collect and use this information for the following purposes:

- to take steps to enter into a contract;
- for compliance with a legal obligation;
- for the performance of a task carried out in the public interest;
- for the purposes of our legitimate interests or those of a relevant third party (such as a benefits provider), but only if these are not overridden by your interests, rights or freedoms;
- because it is necessary for carrying out obligations or exercising rights in employment law;
- for reasons of substantial public interest (ie equality of opportunity or treatment, promoting or retaining racial and ethnic diversity at senior level], preventing or detecting unlawful acts); and
- to establish, exercise and/or defend any legal claims that may be brought by or against us in connection with your recruitment.

5.2 We seek to ensure that our information collection and processing is always proportionate. We will notify you of any changes to information we collect or to the purposes for which we collect and process it.

#### **6. Where information may be held**

6.1 Information may be held at our offices and those of our group companies, and third party service providers. Your personal information may be shared internally for the recruitment exercise. This includes members of the HR team, interviewers involved in the recruitment process, managers in the business area with a vacancy and IT staff who manage user access.

6.2 We will not otherwise share your data with third parties unless your application for employment is successful and we make you an offer of employment.

6.3 Where appropriate, your data may be disclosed to law enforcement, regulatory or other government agencies, or third parties where necessary to comply with legal or regulatory obligations or requests.

## **7. How long we keep your information**

7.1 We keep the personal information that we obtain about you for no longer than is necessary and depends on whether your application is successful and you are employed by us. We will keep recruitment information (including interview notes) for no longer than is reasonable, taking into account the limitation periods for potential claims, after which they will be destroyed. If there is a clear business reason for keeping recruitment records for longer than the recruitment period, we may do so but will first consider whether the records can be pseudonymised.

7.2 If your application is successful, we will keep only the recruitment information that is necessary in relation to your employment.

## **8. Keeping your personal information secure**

8.1 We take appropriate measures to ensure that your personal data is kept secure, including preventing it from being accidentally lost or used or accessed in an unauthorised way. We limit access to your personal data to those who have a legitimate business need to view it.

8.2 Those processing your personal data will do so only in an authorised manner and are subject to a duty of confidentiality.

8.3 We also have procedures in place to deal with any suspected data security breach. We will notify you and any applicable regulator of a suspected data security breach where we are legally required to do so.

## **9. Your rights**

9.1 As the data subject, you can:

9.1.1 access and obtain a copy of your data on request;

9.1.2 require us to change incorrect or incomplete data;

9.1.3 require us to delete or stop processing your data, for example where the data is no longer necessary for the purposes of processing; and

9.1.4 object to the processing of your personal data where we are relying on legitimate interest as the legal ground for processing.

9.2 If you would like to exercise any of these rights, please email [recruitment@cdp.net](mailto:recruitment@cdp.net).

- 9.3 You are under no statutory or contractual obligation to provide us with your personal information during the recruitment process. However, if you do not provide this data, we may not be able to process your application properly or at all.
- 9.4 Please note that we reserve the right to modify this privacy notice at any time. We will promptly reflect any such modifications so that you are always kept informed of how we collect and use your data.

## **10. How to complain**

- 10.1 We hope that we can resolve any query or concern you raise about our use of your personal data. Any query or concern you raise about our use of your information and requests regarding this privacy notice should be addressed to [recruitment@cdp.net](mailto:recruitment@cdp.net).
- 10.2 You may also contact the Information Commissioner at <https://ico.org.uk/concerns/> or telephone: 0303 123 1113 for further information about your rights and how to make a formal complaint.