

## Applicant Privacy Notice

### 1. Introduction

- 1.1 This privacy notice describes how we [CDP Europe – Services GmbH, c/o WeWork, Kemperplatz 1, 10785 Berlin, Germany] collect and use personal information we receive from you during the recruitment process and applies to all applicants.
- 1.2 CDP Europe – Services GmbH is a “data controller”. This means that 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 may include:
  - 2.2.1 your name, address and contact details, including email address and telephone number;
  - 2.2.2 details of your qualifications, skills, experience and employment history; and
  - 2.2.3 your entitlement to work in the country where the role is based.
- 2.3 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.
- 2.4 We may also collect data about you in the form of references supplied by former employers. We will seek such data once a job offer has been made and your consent has been obtained.

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

### **3. Personal information**

3.1 The personal information we obtain in relation to your application will be used by us to consider your suitability for employment.

3.2 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.

3.3 We have a legitimate interest in processing your data during the recruitment process and for keeping records. Processing personal information from job applicants allows us to manage the recruitment process, assess and confirm a candidate's suitability for employment and decide to whom to offer a job.

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

### **4. Personal information disclosure**

4.1 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.

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

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

### **5. Data security**

5.1 We take the security of your personal information seriously. We have 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.

### **6. Data retention**

6.1 If your application for employment is unsuccessful, your personal information will be retained for up to 6 months and will be securely deleted or destroyed once this date has passed.

6.2 If your application for employment is successful, your data gathered during the recruitment process will be transferred to your personnel file and retained during your employment.

### **7. Your rights**

7.1 As the data subject, you can:

- 7.1.1 access and obtain a copy of your data on request;
  - 7.1.2 require us to change incorrect or incomplete data;
  - 7.1.3 require us to delete or stop processing your data, for example where the data is no longer necessary for the purposes of processing; and
  - 7.1.4 object to the processing of your personal data where we are relying on legitimate interest as the legal ground for processing.
- 7.2 If you would like to exercise any of these rights, please email [recruitment.cdpeuropes@cdp.net](mailto:recruitment.cdpeuropes@cdp.net).
- 7.3 If you believe that we have not complied with your data rights, you can raise your concerns with the Information Commissioner's Office (ICO) or your national data protection supervisory authority.
- 7.4 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.
- 7.5 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.

**Berlin, May 23<sup>rd</sup>, 2018**